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AGREEMENT

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MONTANA/ENVIRONMENTAL PROTECTION AGENCY

COOPERATIVE AGREEMENT

Agreement between the Management and Administration

of Montana's Environmental Programs

July 1992 - June 1993

June 1992

Approved:

The undersigned hereby execute this Montana/Environmental Protection Agency Agreement on the management and administration of Montana's Fiscal Year (FY) 1993 Water Pollution Control, Safe Drinking Water, Groundwater, Air Quality, Solid and Hazardous Waste Management, Superfund and Pesticides Programs.

STATE OF MONTANA

Stan Stephens
Governor, State of Montana

8-14-92
Date

Dennis Iverson, Director
Department of Health and
Environmental Sciences

8/14/92
Date

Everett Snortland, Director
Department of Agriculture

8-17-92
Date

ENVIRONMENTAL PROTECTION AGENCY

Jack W. McGraw
Acting Regional Administrator

8/14/92
Date

John F. Wardell, Director
Montana Office

8/14/92
Date

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EXECUTIVE SUMMARY

INTRODUCTION

The goal of Montana's environmental health programs is to protect public health while sustaining a spirit of cooperation between environmental protection and resource development. Accomplishing this requires close coordination between the Departments of Health and Environmental Sciences (DHES) and Agriculture (MDA) for the state, and the federal government's Environmental Protection Agency (EPA).

Through agreements, research, monitoring, technical expertise and other areas of cooperation, the DHES, MDA and EPA are helping Montanans maintain a quality lifestyle. The Montana/EPA Agreement (MEA) contributes to this process by consolidating all narratives and work plans, thus producing a concise document and reducing paperwork and duplication of effort.

The MEA programs are comprised of the MDA's pesticide program, the DHES's air, water, underground injection control, underground storage tanks and leaking underground storage tanks, and solid and hazardous waste programs.

The elements of the MEA include: (1) An overview of the state's environment, (2) identification of priority objectives, (3) strategies to accomplish priorities, (4) detailed work plans, activities and commitments.

To better understand the programs, and what they plan to accomplish, each major area of environmental concern has a narrative discussion of its programs, followed by media work plans defining the proposed work.

ENFORCEMENT AND LEGAL SUPPORT PROGRAM

FISCAL YEAR 1993 PLAN

WATER QUALITY BUREAU
Department of Health and Environmental Sciences

Enforcement and Legal Support

Overview

This section investigates reported violations of the statutes administered within the bureau and initiates appropriate enforcement actions to remedy documented violations. This section provides formal enforcement, litigation, technical administrative rule, and legal opinion support to all programs within the bureau, including those which administer the Water Quality Act, Public Water Supply Act, the Sanitation in Subdivisions Act and the Water and Wastewater Operator Certification Act.

Base Program

The Water Quality Bureau has utilized the services of an Enforcement Officer to coordinate the Bureau's formal enforcement activities and complaint investigations since 1978. Initially the enforcement officer's duties were limited to authorities found in the Water Quality Act, the Department's water pollution control statute. In 1982 enforcement duties pursuant to the Public Water Supply Act were added to the enforcement officer's duties and then responsibilities for enforcement of the Sanitation in Subdivision Act and Water and Wastewater Operator Certification Act were assigned to the position in the later 1980's.

In August of 1991, Bureau reorganization created an Enforcement and Legal Support Section to provide staff support to the Enforcement Officer and more efficiently serve the increasing enforcement needs of the Bureau. Two staff members, whose responsibilities were essentially enforcement related were transferred from other programs to enforcement, and two recently authorized positions were assigned to the Enforcement Section.

One section employee has been placed in the Billings regional office for the purpose of providing more efficient investigation and remediation of water quality and public water supply complaints. One position serves the Helena office in a similar capacity. One currently filled position will continue to provide services in the public water supply compliance and enforcement area. The second new position, when filled, will provide hydrogeological services to the section. The former enforcement officer position serves as a program manager for the section.

The section conducted more than 220 complaint field investigations during the last 12 month period, and conducted follow-up activities including repeat site visits to more than 120 locations of complaints. The Bureau receives between 200 and 300 water quality complaints annually. A substantial backlog of uninvestigated complaints from previous inadequate staffing years exists in both the Billings and Helena offices, and the section is processing approximately 20 active and 25 inactive formal water quality enforcement actions. The section provides training in field investigation protocol, enforcement correspondence, negotiation skills, expert testimony presentation and other enforcement program elements on a semi-annual and as needed basis to staff. The Enforcement Officer/Program Manager has completed one year as chairman of the Department Enforcement Policy Task Force and is the principal author of the Department's Regulatory Enforcement Policies and Procedures Manual nearing completion. Funding for the section is provided by combining resources from the EPA 106 grant, the Drinking Water Fee program and state funds appropriated for the protection of the groundwater resource. The total program budget is approximately $ 372,000.

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL #1: ACCOMPLISH NECESSARY PROGRAM ADMINISTRATIVE DUTIES							
OBJECTIVE #1: Complete Program Planning							
Activities:							
A. Complete Program Planning Tasks	July 1992	Kevin	0.01		551	EPA 106	A
SUBTOTALS			0.01		551	EPA 106	
OBJECTIVE #2: Establish Performance Standards							
Activities:							
A. Draft Individual Performance Standards, Meet to Discuss/Finalize.	July 1992	Kevin Bob Claudia Rob Joe Luella Eric	0.01 0.01 0.01 0.01 0.01 0.01 0.01		551 108 218 164 54 307 204 276 272 276 272 544 422	EPA 106 Gen. Fund Fees-DW EPA-DW RIT-State GW 106 205g 106 EPA 106 Fees-DW EPA 106 Fees-DW Fees DW EQC-State	A
SUBTOTALS:			0.07 FTE		1,614 164 1,306 584	EPA 106 EPA-DW Fees-DW State	

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #3: Monthly Reports/Briefings							
Activities:							
A. Produce Monthly Activity Reports	July-June	Kevin	0.03		1,653	EPA 106	A
		Bob	0.03		326	Gen Fund	
					653	Fees-DW	
					490	EPA-DW	
					163	RIT State	
		Claudia	0.03		920	GW 106	
					613	205g 106	
		Rob	0.03		828	EPA 106	
					816	Fees-DW	
		Joe	0.03		828	EPA 106	
					816	Fees-DW	
		Luella	0.03		1,632	Fees-DW	
		Eric	0.03		1,266	EQC State	
B. Attend Monthly Section Meeting	July-June	Kevin	0.02		1,102	EPA 106	A
		Bob	0.02		217	Gen Fund	
					436	Fees-DW	
					327	EPA-DW	
					109	RIT State	
		Claudia	0.02		613	GW 106	
					409	205g 106	
		Rob	0.02		551	EPA 106	
					544	Fees-DW	
		Joe	0.02		551	EPA 106	
					544	Fees-DW	
		Luella	0.02		1,089	Fees DW	
		Eric	0.02		844	State GW	

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
C. Review Section Monthly Activity Reports	July-June	Kevin	0.04		2,204	EPA 106	A
SUBTOTALS:			0.39 FTE		10,212 817 6,530 2,925	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #4: Accomplish Employee Performance Evaluations							
Activities:							
A. Draft Evaluation, Meet w/staff and Finalize	July Oct Jan Apr	Kevin Bob Claudia Rob Joe Luella Eric	0.02 0.01 0.01 0.01 0.01 0.01 0.01		1,102 108 218 164 54 307 204 276 272 276 272 544 422	EPA 106 Gen Fund Fees-DW EPA-DW RIT State GW 106 205g 106 EPA 106 Fees-DW EPA 106 Fees-DW Fees-DW EQC State	A
SUBTOTALS			0.08 FTE		2,165 164 1,306 584	EPA 106 EPA DW Fees-DW State	

Planni Matrix

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #5: Budget							
Activities:							
A. Investigate/Consolidate Enforcement Budget	Oct	Kevin	0.01		551	EPA 106	A
SUBTOTALS			0.01 FTE		551	EPA 106	
OBJECTIVE #6: Work Assignments							
Activities:							
A. Prioritize assignments, review work product, assign tasks	July-June	Kevin	0.05		2,754	EPA 106	A
SUBTOTALS			0.05 FTE		2,754	EPA 106	
OBJECTIVE #7: Prepare Enforcement Status Reports							
Activities:							
A. Prepare drafts on Q basis	July, Oct Jan, Apr	Bob Claudia	0.01 0.01		108 218 164 54 307 204	Gen Fund Fees-DW EPA-DW RIT State GW 106 205g 106	A

Plannir Matrix

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
B. Meet with Chief Counsel	July, Oct Jan, Apr	Kevin Bob Claudia	0.01 0.01 0.01		551 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA-DW RIT State GW 106 205g 106	A
SUBTOTALS:			0.05 FTE		1,573 328 436 324	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #8: Administer MT Rehab Account							
Activities:							
Solicit Proposals	July-June	Kevin	0.01		551	EPA 106	A
Review Proposals	July-June	Kevin	0.01		551	EPA 106	A
Record Keeping	July-June	Kevin	0.01		551	EPA 106	A
SUBTOTALS:			0.03 FTE		1,653	EPA 106	

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #9: Legislative Session Duties							
Activities:							
A. Legislative review, hearings, testimony, etc.	Dec.-Apr.	Kevin Bob Claudia	0.05 0.1 0.1		2,754 1,089 2,177 1,633 544 3,067 2,045	EPA 106 Gen Fund Fees-DW EPA-DW RIT State GW-106 205g 106	A
SUBTOTALS:			0.25 FTE		7,866 1,633 2,177 1,633	EPA 106 EPA DW Fees-DW State	
GOAL #2: IDENTIFY AND RESPOND TO ALLEGED VIOLATIONS							
OBJECTIVE #1 Respond To Complaints							
Activities:							
A. Accept/Record Complaints (250)	July-June	Kevin Rob Joe	0.05 0.05 0.05		2,754 1,377 1,361 1,377 1,361	EPA 106 EPA 106 Fees-DW EPA 106 Fees-DW	A

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
B. Accept/Record Complaints (150)	July-June	Kevin Rob Joe Eric Luella	(0.03) (0.03) (0.03) (0.03) (0.03)		0 0 0 0 0		C
C. Perform Investigations/Inspections (225)	July-June	Rob Joe Eric	0.1 0.1 0.1	 4,045 955	2,754 2,722 2,754 2,722 4,220	EPA 106 Fees-DW EPA 106 Fees-DW EQC State EPA 106 HWCL State	A
D. Draft Reports/Response (225)	July-June	Rob Joe Eric	0.2 0.2 0.2		5,508 5,444 5,508 5,444 8,440	EPA 106 Fees-DW EPA 106 Fees-DW EQC State	A
E. Follow Up Inspections (16)	July-June	Rob Joe Luella	0.01 0.01 0.01		276 272 276 272 544	EPA 106 Fees-DW EPA 106 Fees-DW Fees-DW	B
F. Follow Up Inspectiona (175)	July-June	Rob Joe Eric Luella	(0.09) (0.09) (0.09) (0.09)		0 0 0 0		C

Enforcement and Legal Support **Fiscal Year 1993** **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
SUBTOTALS:		(0.51) FTE Needed	1.08 FTE	4,045 EPA 106 955 HWCL State	22,584 0 20,142 12,660	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #2: Initiate/Maintain Formal Enforcement							
Activities:							
A. VRF Preparation (10 per year)	July-June	Kevin Rob Joe Luella Eric	0.02 0.02 0.02 0.02 0.02		1,102 551 544 551 544 1,089 844	EPA 106 EPA 106 Fees-DW EPA 106 Fees-DW Fees-DW EQC State	A
B. VRF Preparation (10)	July-June	Kevin Rob Joe Luella Eric	(0.02) (0.02) (0.02) (0.02) (0.02)		0 0 0 0 0		C

Planni Matrix

Enforcement and Legal Support **Fiscal Year 1993** **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
C. Case Management Judicial	July-June	Kevin	0.15		8,262	EPA 106	A
		Bob	0.30		3,267	Gen Fund	
					6,531	Fees-DW	
					4,899	EPA DW	
					1,632	RIT State	
		Claudia	0.30		9,201	GW 106	
					6,135	205g 106	
		Rob	0.2		5,508	EPA 106	
					5,443	Fees-DW	
		Joe	0.2		5,508	EPA 106	
					5,443	Fees-DW	
		Eric	0.5		21,100	EQC State	
D. Case Management Judicial	July-June	Kevin	(0.15)		0		C
		Bob	(0.30)		0		
		Claudia	(0.30)		0		
		Rob	(0.20)		0		
		Joe	(0.20)		0		
		Eric	(0.3)		0		
E. Case Management Administrative	July-June	Kevin	0.1		5,508	EPA 106	A
		Bob	0.1		1,089	Gen Fund	
					2,177	Fees-DW	
					1,633	EPA-DW	
					544	RIT state	
		Claudia	0.1		3,067	GW 106	
					2,045	205g 106	
		Luella	0.2		10,886	Fees-DW	

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
SUBTOTALS:		(1.55) FTE Needed	2.25 FTE		47,438 6,532 32,657 28,476	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #3: Resolve Civil Case Backlog							
Activities							
A. Case Management - Judicial	July-June	Kevin Bob Claudia Eric	0.05 0.05 0.03 0.05		2,754 544 1,089 816 273 920 613 2,110	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106 EQC State	A
B. Case Management - Administrative	July-June	Kevin Bob Claudia Luella	0.01 0.01 0.01 0.15		551 108 218 164 54 307 204 8,165	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 Fees-DW Fees-DW	A
C. Case Management - Administrative	July-June	Kevin Bob Claudia	(0.01) (0.05) (0.05)		0 0 0		C

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
SUBTOTALS:		(0.11 FTE Needed)	0.36 FTE		5,145 980 9,676 3,089	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #4: Accomplish Coliform Violation Contacts							
Activities:							
A. Accomplish Coliform Violation contacts, issue Health Advisories, issue Boil Orders, conduct sanitary surveys, maintain records	July-June	Kevin Luella Rob Joe Eric	0.01 0.5 0.3 0.3 0.01		551 27,216 8,262 8,116 8,262 8,116 422	EPA 106 Fees-DW EPA 106 Fees-DW EPA 106 Fees-DW EQC State	A
SUBTOTALS:			1.12 FTE		17,075 0 43,448 422	EPA 106 EPA DW Fees-DW State	

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL #3 PROVIDE ENFORCEMENT SKILLS TRAINING AND EDUCATION							
OBJECTIVE #1: Provide Enforcement Procedures Training To Staff							
Activities:							
A. Provide Enforcement Section and Bureau Staff Training	July-June (as needed)	Kevin Bob Claudia	0.02 0.01 0.01		1,102 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	A
SUBTOTALS:			0.04 FTE		1,613 164 218 162	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #2: Establish Enforcement Strategy For Each Section							
Activities:							
A. Review drafts/comment	Sept-Oct	Kevin	0.02		1,102	EPA 106	B
B. Review final	Sept-Oct	Kevin	0.01		551	EPA 106	B
SUBTOTALS:			0.03 FTE		1,653	EPA 106	

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #3: Implement EPTF Report							
Activities:							
A. Implement EPTF Report - Department Training	July-Sept	Kevin Bob Claudia	0.02 0.01 0.01		1,102 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	A
SUBTOTALS:			0.04 FTE		1,613 164 218 162	EPA 106 EPA DW Fees-DW State	
GOAL #4: PROPOSE/DRAFT STATUTORY AMENDMENTS AND ADMINISTRATIVE RULES AMENDMENTS							
OBJECTIVE #1: Draft Rules for PWS Act Administrative Penalty Assessment							
Activities:							
A. Draft Penalty Matrix	July	Kevin	0.01		551	EPA 106	A
B. Draft Rule	July-Aug	Claudia	0.01		307 204	GW 106 205g 106	A
C. Final and Process	Aug.	Claudia	0.01		307 204	GW 106 205g 106	A
SUBTOTALS:			0.03		1,573	EPA 106	

Enforcement and Legal Support **Fiscal Year 1993** **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #2: Propose Draft Legislation and Amendments for 92-93 Session							
Activities:							
A. Draft bills	Sept.	Kevin	0.01		551	EPA 106	A
		Bob	0.02		217	Gen Fund	
					436	Fees-DW	
					327	EPA DW	
					109	RIT State	
		Claudia	0.02		613	GW 106	
					409	205g 106	
B. Reviews	Nov-Dec	Kevin	0.01		551	EPA 106	A
		Bob	0.01		108	Gen Fund	
					218	Fees-DW	
					164	EPA DW	
					54	RIT State	
		Claudia	0.01		307	GW 106	
					204	205g 106	
SUBTOTALS:			0.08 FTE		2,635	EPA 106	
					491	EPA DW	
					654	Fees-DW	
					488	State	
OBJECTIVE #3: Process Administrative Rule Requests							
Activities:							
A. Review Request Form	July-June	Kevin	0.02		1,102	EPA 106	A

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
B. Draft Rule	July-June	Bob	0.10		1,089 2,177 1,633 544	Gen Fund Fees-DW EPA DW RIT State	A
		Claudia	0.10		3,067 2,045	GW 106 205g 106	
C. Process/Promulgation	July-June	Bob	0.03		326 653 490 163	Gen Fund Fees-DW EPA DW RIT State	A
		Claudia	0.03		920 613	GW 106 205g 106	
SUBTOTALS:			0.28 FTE		7,747 2,123 2,830 2,122	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #4: Process Legal Opinion Request Forms - Formal and Informal							
Activities:							
A. Review Request Form	July-June	Kevin	0.01		551	EPA 106	A
B. Draft Opinion/Consult	July-June	Bob	0.1		1,089 2,177 1,633 544	Gen Fund Fees-DW EPA DW RIT State	A
		Claudia	0.1		3,067 2,045	GW 106 205g 106	

Planning Matrix

Enforcement and Legal Support — **Fiscal Year 1993** — **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
C. Draft Opinion/Consult	July-June	Bob Claudia	(0.1) (0.1)		0 0		C
SUBTOTALS:		0.2 FTE Needed	0.21 FTE		5,663 1,633 2,177 1,633	EPA 106 EPA DW Fees-DW State	
GOAL #5: CONTINUE PROGRAM EVALUATION AND DEVELOPMENT							
OBJECTIVE #1: Complete EPTF Work							
Activities:							
A. Review Enforcement Stratagies for Bureaus	July-Sept	Kevin	0.01		551	EPA 106	B
B. Review Task Force Document	August	Kevin	0.01		551	EPA 106	A
C. Periodic Task Force Meetings	Sept-Dec	Kevin	0.01		551	EPA 106	B
SUBTOTALS:			0.03 FTE		1,653	EPA 106	
OBJECTIVE #2: Evaluate Enforcement Program Staff Resource Needs							
Activities:							

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Identify Tasks/Prioritize	Sept-Oct	Kevin	0.02		1,102	EPA 106	A
		Bob	0.01		108	Gen Fund	
					218	Fees-DW	
					164	EPA DW	
					54	RIT State	
		Claudia	0.01		307	GW 106	
					204	205g 106	
		Rob	0.01		276	EPA 106	
					272	Fees-DW	
		Joe	0.01		276	EPA 106	
					272	Fees-DW	
		Luella	0.01		544	Fees-DW	
		Eric	0.01		422	EQC State	
B. Conduct Time Studies/Consolidate	June-Apr	Kevin	0.02		1,102	EPA 106	
		Bob	0.01		108	Gen Fund	
					218	Fees-DW	
					164	EPA DW	
					54	RIT State	
		Claudia	0.01		307	GW 106	
					204	205g 106	
		Rob	0.01		276	EPA 106	
					272	Fees-DW	
		Joe	0.01		276	EPA 106	
					272	Fees-DW	
		Luella	0.01		544	Fees-DW	
		Eric	0.01		422	EQC State	
C. Summary to Bureau Chief	May	Kevin	0.01		551	EPA 106	B

Planni Matrix

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
SUBTOTALS:			0.17 FTE		4,881 328 2,612 1,168	EPA 106 EPA DW Fees DW State	
OBJECTIVE #3: Identify and Procure Resources for Enforcement							
Activities:							
A. Review Staffing Needs and Costs, and Prioritize	Apr-June	Kevin	0.02		1,102	EPA 106	B
B. Identify Potential Funding Sources	May-June	Kevin	0.01		551	EPA 106	B
C. Procure Funding	May-June	Kevin	0.01		551	EPA 106	B
SUBTOTALS:			0.04 FTE		2,204	EPA 106	
OBJECTIVE #4: Implement Program Staff Needs Recommendations							
Activities:							
A. Implementation	June	Kevin	(0.1)		0		C
SUBTOTALS:		(0.1) FTE Needed	0 FTE		0	-	
OBJECTIVE #5: Improve Compliance Rates							
Activities:							

Enforcement and Legal Support **Fiscal Year 1993** **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Identify Areas of Noncompliance	Nov-Mar	Kevin Joe Rob Luella Eric	0.01 0.01 0.01 0.01 0.01		551 276 272 276 272 544 422	EPA 106 EPA 106 Fees-DW EPA 106 Fees-DW Fees DW EQC State	B
B. Prioritize	Mar	Kevin	(0.01)		0		C
C. Identify Available Personnel	Mar	Kevin	(0.01)		0		C
D. Contact Responsible Parties	Apr	Joe Rob Luella Eric	(0.01) (0.01) (0.01) (0.01)		0 0 0 0		C
SUBTOTALS:		(0.06) FTE Needed	0.05 FTE		1,103 0 1,088 422	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #6: Improve Compliance Assessment Efficiency							
Activities:							

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Review Assessment Practices	Nov	Kevin	0.01		551	EPA 106	B
		Rob	0.01		276	EPA 106	
					272	Fees-DW	
		Joe	0.01		276	EPA 106	
					272	Fees-DW	
		Luella	0.01		544	Fees-DW	
		Eric	0.01		422	EQC State	
B. Identify Weaknesses	Nov-Dec	Kevin	0.01		551	EPA 106	B
		Rob	0.01		276	EPA 106	
					272	Fees-DW	
		Joe	0.01		276	EPA 106	
					272	Fees-DW	
		Luella	0.01		544	Fees-DW	
		Eric	0.01		422	EQC State	
C. Propose Solutions/Consult	Dec	Kevin	(0.01)		0		C
D. Implement Solutions	Jan-Feb	Staff	(0.05)		0		C
SUBTOTALS:		(0.06) FTE Needed	0.10 FTE		2,206	EPA 106	
					0	EPA DW	
					2,176	Fees-DW	
					844	State	

Enforcement and Legal Support

Fiscal Year 1993

By Kevin Keenan

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #7: Improve Civil Case Selection Efficiency							
Activities:							
A. Review Present Practices	Nov-Dec	Kevin Bob Claudia	0.01 0.01 0.01		551 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	B
B. Propose Modifications/Consult	Dec	Kevin Bob Claudia	(0.01) (0.01) (0.01)		0 0 0		C
C. Implement	Jan	Kevin Bob Claudia	(0.01) (0.01) (0.01)		0 0 0		C
SUBTOTALS:		(0.06) FTE Needed	0.03 FTE		1,062 164 218 162	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #8: Improve Enforcement Case Referral Efficiency							
Activities:							

Planning Matrix

Enforcement and Legal Support | **Fiscal Year 1993** | **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Review Present Practices	Dec-Jan	Kevin Bob Claudia	0.01 0.01 0.01		551 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	B
B. Propose Modifications/Consult Bureau	Jan	Kevin Bob Claudia	0.01 0.01 0.01		551 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	B
C. Implement	Feb	Kevin Bob Claudia	(0.01) (0.01) (0.01)		0 0 0		C
SUBTOTALS:		(0.03) FTE Needed	0.06 FTE		2,124 328 436 324	EPA 106 EPA DW Fees-DW State	
OBJECTIVE #9: Decrease Civil Case Settlement Time-Frames							
Activities:							

Enforcement and Legal Support **Fiscal Year 1993** **By Kevin Keenan**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Review Present Practices	Jan-Feb	Kevin Bob Claudia	0.01 0.01 0.01		551 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	B
B. Propose Modifications/Consult	Feb	Kevin Bob Claudia	0.01 0.01 0.01		551 108 218 164 54 307 204	EPA 106 Gen Fund Fees-DW EPA DW RIT State GW 106 205g 106	B
C. Implement	Mar	Kevin Bob Claudia	(0.01) (0.01) (0.01)		0 0 0		C
SUBTOTALS:	-	(0.03) FTE Needed	0.06 FTE		2,124 328 436 324	EPA 106 EPA DW Fees-DW State	
GRANDTOTAL		**(2.71) FTE Needed 0.98 Legal 1.73 Tech.**	**7.0 FTE**	**4,045 EPA 106 955 HWCL**	**161,035 16,341 130,741 58,670 371,787**	**EPA 106 EPA DW Fees-DW State**	

General Comments

1. Dollar amounts may vary slightly as a consequence on rounding of value.

2. 1.00 FTE = 1,880 hours 0.02 FTE = ≈ 1 week

3. Total funding to support the needed FTEs for priority "C" items would be approximately $149,000 (2.71 FTE)

4. The "needed" 2.71 FTE should be 1.00 FTE legal and the balance (1.70) FTEs technical.

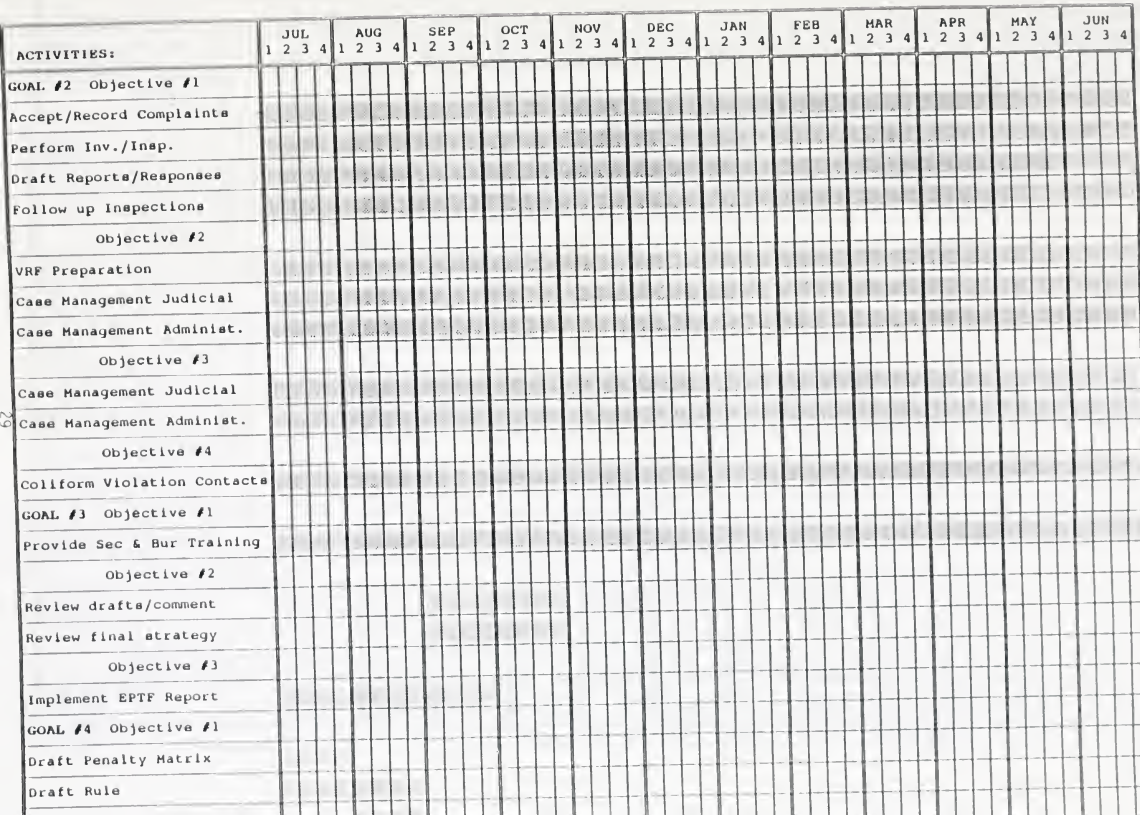
Plannin alendar

Unit: Enforcement & Legal Support

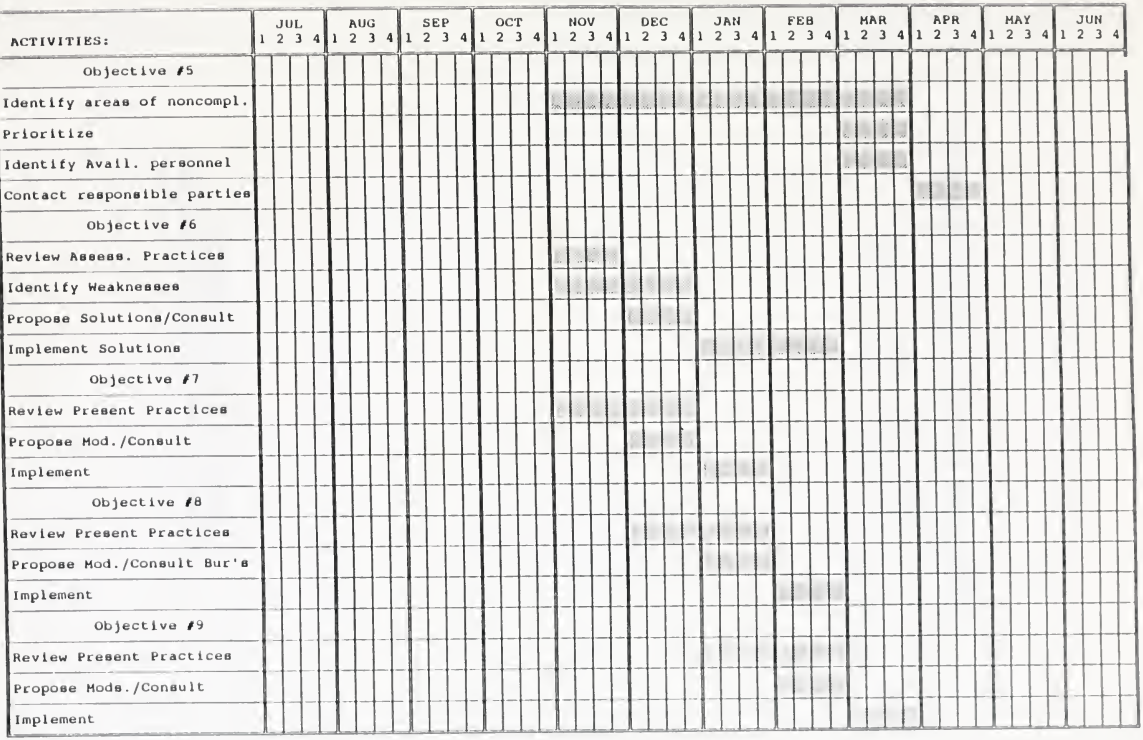
Fiscal Year: 1993

By: Kevin Keenan

ACTIVITIES:	JUL 1 2 3 4	AUG 1 2 3 4	SEP 1 2 3 4	OCT 1 2 3 4	NOV 1 2 3 4	DEC 1 2 3 4	JAN 1 2 3 4	FEB 1 2 3 4	MAR 1 2 3 4	APR 1 2 3 4	MAY 1 2 3 4	JUN 1 2 3 4
GOAL #1 Objective #1												
Complete Program Planning												
Objective #2												
Draft Performance Standards												
Objective #3												
Produce Monthly Act. Rpts												
Attend Monthly Section Mtgs												
Review Monthy Act. Rpts												
Objective #4												
Draft Evaluation												
Objective #5												
Enforcement Budget												
Objective #6												
Prioritize, review, assign												
Objective #7												
Prepare drafts on Q basis												
Meet with Chief Council												
Objective #8												
Solicit Rehab Acct proposal												
Review Proposals												
Record Keeping												
Objective #9												
Legislative review, test.												


ACTIVITIES:
JUL 1 2 3 4
AUG 1 2 3 4
SEP 1 2 3 4
OCT 1 2 3 4
NOV 1 2 3 4
DEC 1 2 3 4
JAN 1 2 3 4
FEB 1 2 3 4
MAR 1 2 3 4
APR 1 2 3 4
MAY 1 2 3 4
JUN 1 2 3 4
GOAL #2 Objective #1
Accept/Record Complaints
Perform Inv./Insp.
Draft Reports/Responses
Follow up Inspections
Objective #2
VRF Preparation
Case Management Judicial
Case Management Administ.
Objective #3
Case Management Judicial
Case Management Administ.
Objective #4
Coliform Violation Contacts
GOAL #3 Objective #1
Provide Sec & Bur Training
Objective #2
Review drafts/comment
Review final strategy
Objective #3
Implement EPTF Report
GOAL #4 Objective #1
Draft Penalty Matrix
Draft Rule

ACTIVITIES:	JUL 1 2 3 4	AUG 1 2 3 4	SEP 1 2 3 4	OCT 1 2 3 4	NOV 1 2 3 4	DEC 1 2 3 4	JAN 1 2 3 4	FEB 1 2 3 4	MAR 1 2 3 4	APR 1 2 3 4	MAY 1 2 3 4	JUN 1 2 3 4
Objective #2												
Draft bills												
Reviews Leg. Amend.												
Objective #3												
Review Request Form												
Draft Administrative Rule												
Process/Promulgation												
Objective #4												
Review Request Form												
Draft Legal Opinion/Consult												
GOAL #5 Objective #1												
Review Enf Strat for Bure												
Review Task Force Doc.												
Periodic Task Force Mtgs												
Objective 2												
Identify Tasks/Prioritize												
Time Studies/Consolidate												
Summary to Bureau Chief												
Objective #3												
Review Staffing Needs												
Identify Funding Source												
Procure Funding												
Objective #4												
Implementation Needs												


ACTIVITIES:
JUL 1 2 3 4
AUG 1 2 3 4
SEP 1 2 3 4
OCT 1 2 3 4
NOV 1 2 3 4
DEC 1 2 3 4
JAN 1 2 3 4
FEB 1 2 3 4
MAR 1 2 3 4
APR 1 2 3 4
MAY 1 2 3 4
JUN 1 2 3 4
Objective #5
Identify areas of noncompl.
Prioritize
Identify Avail. personnel
Contact responsible parties
Objective #6
Review Assess. Practices
Identify Weaknesses
Propose Solutions/Consult
Implement Solutions
Objective #7
Review Present Practices
Propose Mod./Consult
Implement
Objective #8
Review Present Practices
Propose Mod./Consult Bur's
Implement
Objective #9
Review Present Practices
Propose Mods./Consult
Implement

SURFACE WATER PERMITS PROGRAM

FISCAL YEAR 1993 PLAN

WATER QUALITY BUREAU
Department of Health and Environmental Sciences

Permits/Groundwater Section

FY 1993 Surface Water Permits/Compliance Program Plan Narrative

The mission of this program is to protect, maintain, and improve the quality of state waters for beneficial uses, and to prevent, abate, and control water pollution.

The program controls the quantity and quality of wastes that are discharged to state waters through the issuance of MPDES permits, review of monitoring reports and compliance inspection of permitted facilities. Oil and hazardous material spills are documented and tracked for cleanup under this program, and assistance is provided in investigation, followup, and enforcement of water pollution incidents, particularly those associated with permitted facilities.

Typical activities under MPDES include processing new and renewal permit applications for all wastewater discharges to state surface waters; reviewing discharge quality data from the permittees; tracking to assure compliance and following up to address compliance problems; compliance inspections and monitoring of facilities; and answering requests for information about permittees. About 75 individual MPDES applications and about 90 general MPDES applications are processed each year.

Under the 1987 revisions to the Clean Water Act and the current EPA regulations, several additional items are being addressed by the NPDES program in addition to the traditional NPDES permits:

(1) Increased emphasis on toxics control, including whole effluent toxicity elimination requirements and addressing specific toxics such as dioxin. Total maximum daily loads of deleterious substances are expected to be set up for receiving streams and waste loads allocated among dischargers.

(2) Sludge management program requirements to be incorporated into the permits.

(3) Administration of the industrial pretreatment program in certain cities and as necessary in smaller cities statewide.

(4) Requirement for stormwater permitting of industries.

The WQB acknowledges that these new activities are important and worthwhile in order to make up a complete water quality protection program for point sources. However, these additional activities will require additional staff resources as estimated in the work plan, at least 2.5 FTE. Since available federal funding is declining and not sufficient to cover even the present program long term, the WQB plans to implement permit fee legislation through the 1993 legislature.

The WQB also believes in order to maintain permit program credibility that additional staff are needed to make it possible to perform pre-permitting facility inspections and post-permitting compliance inspections. With present staff, very few pre-permit inspections are made and only about 50 compliance inspections can be done per year. We believe the permit program is currently perceived as largely a "paper program" by environmental groups as well as by the regulated public because of the lack of field presence of inspectors. Our credibility and the state's water quality definitely suffer from this. In order to allow pre-permit site visits, compliance inspections of slightly more than half of the minors, and an additional inspection of the majors each year, an additional 2.37 FTE will be needed.

Finally in order to provide resources for adequate spill followup as per the spill protocol, an additional 0.26 FTE will be needed.

1087

FY 1993 Industrial Pretreatment Program Narrative

This program was included in the federal NPDES regulations in 1973. Industrial wastes discharged into publicly owned treatment works (POTW's) have the potential to adversely affect the POTW's by causing (1) upsets in the biological treatment processes; (2) pass-through of pollutants into the POTW discharge and receiving stream; (3) contamination of the sludge causing problems with its disposal; and (4) potential harmful conditions for the POTW workers.

The objective of the pretreatment program is to control the quality and quantity of industrial discharges to POTW's by a permit system. These permits contain limitations and conditions which are designed to protect the POTW, and subsequently the plant workers and the receiving water, from the harmful effects of industrial discharges. With the current emphasis on toxics control, the state's POTW's need to be assured the protection afforded to them by the pretreatment program.

Although the State of Montana does not have a lot of heavy polluting industry, there are numerous examples, such as metal platers, tanneries, dairies, food processing industries and wastewater from groundwater clean-up which need to be controlled. The EPA is presently administering the program in Montana with help from WQB personnel, but is pressuring the state to assume delegation of the program. The state has included pretreatment regulations with its MPDES regulations, but as yet does not have the staff resources to assume the program delegation.

1084

FY 1993 Sludge Program Narrative

Generally, as a part of physical, chemical, and biological forms of water treatment, solid residues commonly called sludges are created when undesirable constituents (pollutants) are removed from the water. These residues - settleables, floatables, precipitates, spent media, biological growths, etc., usually concentrate pollutants such as toxics and must be disposed of, recycled, or beneficially used carefully and properly to avoid harm to human health and the environment.

EPA regulation of sludges is becoming more complex and scrutiny is becoming much greater in an effort to insure that environmental damage is avoided. Sludge management plans are or should be required for nearly every water or wastewater treatment facility. Wastewater lagoons usually do not have to deal with sludge management on a daily basis but eventually their sludge may have to be dredged and dealt with. Mechanical treatment plants create a constant flow of sludge which must be managed on a daily basis.

Final regulations for technical requirements in sludge management are due to be promulgated in Part 503 of the CFR in the last half of 1992. The permits program is projecting at least 0.85 FTE of additional staff resources will be required to comply with these regulations. Additional requirements will have to be included in MPDES permits addressing sludge management, and staff will have to review sludge monitoring and sludge site monitoring data, work with and train permittees, coordinate with EPA and other agencies, update state regulations, and check for and encourage compliance with the regulations.

1107

FY 1993 Stormwater Program Narrative

Since the enactment of the 1972 amendments to the federal Clean Water Act, the NPDES regulations have resulted in the cleaning up of many municipal and industrial point source discharges which were significantly degrading receiving water quality. Now, a greater percentage of the remaining degradation of the nation's waterways can be attributed to more diffuse sources of water pollution, such as stormwater runoff.

The 1987 federal Water Quality Act required EPA to promulgate regulations requiring permits for stormwater discharges associated with industrial activity and discharges from large municipal storm sewer systems. Although Montana's cities are not large enough to fit the current definition requiring municipal storm sewer discharge permits, there are hundreds and possibly thousands of industrial activities carried on by the state's industries and municipalities which do fit the industrial activity definition requiring storm water discharge permits.

The current federal regulations requiring storm water discharge permits became effective December 17, 1990. While the regulations promise to address and eliminate some sources of significant water quality degradation, they also have created a huge "instant backlog" of permitting and compliance work for the state-delegated NPDES program. Even by utilizing the most streamlined permit approach possible through the use of general permits, the state resource needs to implement the program be at least 2.5 FTE, not counting additional legal resources which will be consumed in mandating compliance with the regulations.

1106

Program Surface Water Program **Fiscal year 1993** **By Fred Shewman**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
GOAL #1: Implement Surface Water Program							
OBJECTIVE #1: Administration including planning, budgeting, public relations and staff supervision							
ACTIVITIES:							
A. Conduct administrative duties necessary for program maintenance and development; public relations; supply program information; answer public inquiries; develop budgets and contracts; write reports, grant applications; and plan. Develop 1994 program work plan.	Ongoing 1994 plan due 5-93	Fred Shewman	0.30	1,000			A
B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.	Ongoing	Fred Shewman	0.18				A
SUBTOTALS for Objective #1			0.48	1,000	29,293	106	
OBJECTIVE #2: Maintain the MPDES Program							
ACTIVITIES:							
A. Issue approximately 25 new and 50 renewal MPDES per year. Include WET, sludge, and pretreatment requirements when necessary.	Ongoing	Joe Strasko Mike Pasichnyk Fred Shewman	1.00				A
B. Pre-permit visit for quality control for MPDES	Rarely	Need 0.48 FTE	0				C
C. Issue approximately 90 general permit authorizations per year	Ongoing	Joe Strasko Mike Pasichnyk	0.13				A
D. Pre-authorization visit for quality control	Never	Need 0.38 FTE	0				C
E. Update regulations approximately every 2 (two) years	Next 6-92	Fred Shewman	0.09	3,500			B
F. Compliance inspection of majors one time per year	Ongoing	Joe Strasko	0.29	5,000			A

Program Surface Water Program **Fiscal year 1993** **By Fred Shewman**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
F. Compliance inspection of majors one time per year	Ongoing	Joe Strasko	0.29	5,000			A
G. Compliance inspection of majors, one additional time per year	Never	Need 0.29 FTE	0				C
H. Compliance inspection of minors and general permit authorizations 250 per year plus 24 complaints per year	Rarely	Need 1.22 FTE	0				C
I. Maintain PCS system, conduct monthly DMR meetings and followup initial enforcement	Ongoing	Mike Pasichnyk	0.60	1,500			A
J. Provide quarterly list of permits issued with WQS, WET, sludge, or pretreatment requirements	Quarterly	Mike Pasichnyk	0.00				A
K. Followup on yearly DMR/QA program (lab deficiencies)	Yearly	Mike Pasichnyk	0.04				B
L. Receive and give training	Ongoing	Fred Shewman Mike Pasichnyk Joe Strasko	0.12				B
M. Administrative support services	Ongoing	Dolly Davis	1.00		44,560 10,520	106 State HWC	A
SUBTOTALS for Objective #2		Need 2.37 FTE	3.27	10,000	188,363 10,520	EPA 106 State HWC	
OBJECTIVE #3: Spill Tracking and Response							
ACTIVITIES:							
A. Receive and record into database approximately 300 spill reports per year, follow up as per spill protocol	Ongoing	Mike Pasichnyk Joe Strasko Fred Shewman	0.13				A
B. Extended followup on 3-4 major spills per year	Occasional	Mike Pasichnyk	0.05	1,000			A

Program Surface Water Program **Fiscal year 1993** **By Fred Shewman**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
C. Provide spill response training once per year at sanitarian's conference	Yearly	Mike Pasichnyk	0.01				B
D. Receive spill response training every 2 (two) years from EPA or contractor	Occasional	Mike Pasichnyk Joe Strasko Fred Shewman	0.01	500			B
E. Extra spill visits required to satisfy protocol	Occasional	Need 0.26 FTE	0				C
SUBTOTALS for Objective #3		Need 0.26 FTE	0.20	1,500	13,289	106	
OBJECTIVE #4: Review DSL Operating Permit Applications							
ACTIVITIES:							
A. Review 5-8 mine applications per year for MPDES	Occasional	Fred Shewman Joe Strasko	0.05				B
SUBTOTALS for Objective #4			0.05	3,250	6,197	106	
OBJECTIVE #5: Implement Storm Water Program							
ACTIVITIES:							
A. Grant application, budget amendment, hire 1.0 FTE	June-Oct 1992	Fred Shewman Roxann Lincoln	0.05			EPA	A
B. Issue general permits for industries, mines, construction	Due 9-92	Roxann Lincoln	0.20			EPA	A
C. Administer contracts for BMP's and mine map/list	4-92 to 8-92	Roxann Lincoln	0.10	8,000		EPA	B
D. Public Information, Program updates, workshops, guidance document	Quarterly	Roxann Lincoln	0.08	5,000		EPA	B
E. Issue authorizations under general permits	Ongoing Post 10-92	Roxann Lincoln New Env. Spec.	0.25			EPA	A

Plann' Matrix

Program Surface Water Program | **Fiscal year 1993** | **By Fred Shewman**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
F. Review Storm Water Management Plans	Ongoing Post 11-92	Roxann Lincoln New Env. Spec.	0.30			EPA	B
G. Compliance inspect sites	Ongoing Post 11-92	Roxann Lincoln New Env. Spec.	0.30	1,500		EPA	A
H. Track/follow up noncompliance	Ongoing Post 11-92	Roxann Lincoln New Env. Spec.	0.20			EPA	A
I. Write storm water application and fee rules	6-93	Roxann Lincoln Fred Shewman	0.20	3,000		EPA	A
J. Administrative Support services	Ongoing	Amanda Domino	0.50			EPA	A
SUBTOTALS for Objective #5 (New Env. Spec. available only 0.68 yr)			2.18	17,500	126,500	104(b)(3)	
OBJECTIVE #6: Implement pretreatment program							
ACTIVITIES: EPA currently retains delegation - state assists if possible							
A. Program inspections/audits (9 cities) yearly	Ongoing	Need 0.15 FTE	0				C
B. Answer inquiries on permits from industries and small POTWs.	Ongoing	Need 0.17 FTE	0				C
C. Process industrial permits for small POTWs	Ongoing	Need 0.15 FTE	0				C
D. Consult with cities on program maintenance and development	Ongoing	Need 0.08 FTE	0				C
E. Consult with EPA, with WQB sludge program, with SHWB; maintain and update regulations	Ongoing	Need 0.07 FTE	0				C

Program Surface Water Program **Fiscal year 1993** **By Fred Shewman**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
F. Incorporate pretreatment requirements in permits as required.	Ongoing	Included in #2.A.	0				A
SUBTOTALS for Objective #6		Need 0.62 FTE					
OBJECTIVE #7: Implement sludge program							
ACTIVITIES: EPA retains delegation - new program, no activity yet							
A. Compliance sample sludge sites (municipal and industrial)	Ongoing	Need 0.28 FTE	0				C
B. Review self-monitoring data and follow up	Ongoing	Need 0.37 FTE	0				C
C. Consult with other programs, consult on short term sludge applic. projects, develop regulations, etc.	Ongoing	Need 0.10 FTE	0				C
D. Consult with permittees, train operators	Ongoing	Need 0.10 FTE	0				C
E. Incorporate sludge conditions in permits as required	Ongoing	Included in #2.A.	0				A
SUBTOTALS for Objective #7		Need 0.85 FTE	0				
GRAND TOTALS		Need 4.10 FTE	**6.18**	**33,250**	**237,142 10,520 126,500**	**EPA 106 State HWC 104 (b)(3)**	

ASSUMPTIONS: 1 FTE = 1880 hours per year (at work)
1.00 FTE = $58,944 for FS, MP, JS 0.5 KK
55,080 for DD
50,000 for Stormwater

GROUND WATER PROGRAM

FISCAL YEAR 1993 PLAN

WATER QUALITY BUREAU

Department of Health and Environmental Sciences

GROUND WATER PROGRAM

Ground Water Program work activities and staff have expanded. One professional FTE and 1/2 FTE administrative support FTE provided by the 52nd Legislature have been hired to work primarily on permits. Approval is anticipated for an additional 1/2 professional FTE to add to the already approved 1/2 FTE to work on Water Quality Districts, Wellhead Protection and permits.

Ground water staff are participating in a Department work group that is modifying the nondegradation regulatory framework. Results of this work will determine what permits are issued by the program. Duties related to MGWPCS permits continue for the program. Work with the Department of State Lands (DSL) on large mining and milling operations proceed under a MOU between DSL and DHES. Investigation of complaints related to ground water and oversight of spill cleanups are handled by the ground water program staff. Integration with the Department's waste management programs is necessary to ensure that concerns such as proper hazardous waste disposal are addressed at these sites. Staff continue to investigate and respond to citizen complaints and inquiries related to ground water and ground water program staff provide hydrogeologic expertise to other Bureau programs.

An MOU between the Department and the Department of Agriculture (DAg) is being finalized to describe Department responsibilities under the Montana Agricultural Chemical Ground Water Protection Act (MACGWPA). Modifications to the MGWPCS rules have been drafted to address the MACGWPA. Program staff are working with DAg to write a general pesticide management plan. Staff are also working on a 319 Nonpoint - Ground Water Demonstration project to implement Wellhead protection in an agricultural setting.

Final review and approval of the Wellhead Protection program is anticipated by January 1993. Demonstration projects to promote wellhead protection and education will be conducted with four Montana schools. Rules for Water Quality Districts are being finalized and staff will work with two counties to review proposed district plans. Ground Water program staff also oversee work activities at several state superfund sites where ground water is contaminated.

The current Ground Water Program staff are unable to adequately fulfill their responsibilities. Activities that are potential sources of ground water contamination must comply with the MGWPCS standards. Program staff should review permits issued by other agencies to ensure compliance with MGWPCS standards. However, these reviews are not conducted because of limited staff. Oversight of a ground water cleanup often lasts many years. As more ground water contamination sites are discovered the number of sites which require oversight increases. Under an MOU, DHES should review DSL operating permit applications. However, because of size and complexity of these projects and the shortage of staff, DHES reviews are either inadequate or not conducted. Several other activities are necessary to optimize program operation but funding and staff are not available. Funding is available from EPA to administer the UIC Class V injection well program but staff cannot allocate the time to develop program application materials. Development of guidance documents such as an explanation of standards, a permit application guide or standard ground water sampling procedures would assist industry and the public.

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE I: Effectively administer Ground Water program, including planning, budgeting and staff supervision.							
Activities: **Administration**							
A. Conduct administrative duties necessary for program maintenance and support. (Review monthly SBAS, monitor expenditures, track progress with FY93 Plan and develop FY94 plan and budget)	Ongoing FY93 plan by May 93	John	.2		9,862	EPA	A
B. Assign duties, fill positions, train, monitor and conduct evaluations. (Daily interaction, fill WQ District FTE, update performance standards and conduct annual evaluations)	Ongoing Fill WQD FTE by Sept. 93	John	.2		9,862	EPA	A
C. Participate in Bureau work group to modify Water Quality Act and nondegradation and ground water regulations. (Rewrite MGWPCS rules and develop permits strategy)	Draft rules by Aug. 93 Strategy by Oct. 93	John	.2		9,862	EPA	A
D. Provide support services to program, including permit and public notice processing, data entry, report generation, mailing, filing, information requests, etc. Assist WHP Advisory Committee and other meetings.	Ongoing	Dianne	.5		21,101	State	A
E. Respond to information requests and inquiries from state and local officials, the public, industry and other groups, provide information and education and interpret applicability of statutes and regulations.	Ongoing	John (.1) Terry (.05) Carole (.05) Carolyn (.03) Tim (.05)	.28		11,341 2,110	EPA State	B
F. Participate in groups to enhance ground water quality protection: (Board of Water Well Contractors and Ground Water Assessment Steering Committee)	Bimonthly meetings	John	.05		2,465	EPA	B

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
G. Submit application to EPA for authorization to administer Underground Injection Control program for Class V injection wells.	None	Need .25 FTE	0		0		C
H. Develop and implement staff training program for safety, regulatory policies, sampling, etc.	None	Need .5 FTE	0		0		C
I. Design, purchase and maintain ground water sampling vehicle.	None	Need .1 FTE	0		0		C
SUBTOTALS		Need .85 FTE	1.43		43,393 23,210	EPA State	
OBJECTIVE II: Implement the Montana Ground Water Pollution Control System (MGWPCS) permit program to control sources of ground water pollution and to support ground water enforcement activities.							
Activities: **MGWPCS Permits and Enforcement**							
A. Process new permits applications, permit renewals and modifications. (one new permit or modification per month)	Ongoing	John (.05) Terry (.3) Tim (.3)	.65		17,259 12,660	EPA State	A
B. Conduct site visit of proposed permit facilities. (8 per year)	1 per quarter	Terry (.05) Tim (.05) Need .1 FTE	.1		2,465 2,110	EPA State	B
C. Evaluate permit self monitoring data to determine compliance. (monthly review)	Rarely	Need .25 FTE	0		0		C
D. Conduct compliance inspections of permitted facilities twice per year. (40 permitted facilities - 80 inspections per year)	20 inspections 60 inspections	Terry (.1) Tim (.1) Need .6 FTE	2		4,931 4,220	EPA State	B C

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
E. Respond to spills that threaten ground water and oversee cleanup of ground water contamination sites. Work with responsible parties and other appropriate programs to develop cleanup and monitoring plans, and oversee compliance. (4 per month)	2 per month 2 per month	Tim (.3) Terry (.3) WQDFTE (.1) John (.05) Carole (.02) Carolyn (.02) Need .79 FTE	.79		19,231 16,880	EPA State	A C
F. Collect environmental samples at permitted facilities and ground water contamination sites to document compliance and levels of contamination. (4 sampling events per month)	1 event per month 3 events per month	Terry (.05) Tim (.05) Need .3 FTE	.1	41,900	2,465 2,110	EPA State	B
G. Review Dept. of State Lands hard rock mine operating permit applications and track compliance with MGWPCS standards. (10 per month)	1 per month 9 per month	Terry (.05) Tim (.05) Need .9 FTE	.1		2,465 2,110	EPA State	B C
H. Write Ground Water Program QA/QC plan.	Mar. 93	WQD FTE	.05		2,110	State	B
I. Review permits issued by other programs and agencies to determine compliance with ground water standards. (SHWB permits, DSL exploration/open-cut permits, BO&G drilling/injection permits)	None	Need 4 FTE	0		0		C
J. Provide support to Enforcement program. (Follow up on ground water complaints, develop enforcement requests, monitor compliance, provide technical expertise as needed)	Ongoing	John (.1) Terry (.05) Tim (.05)	.2		7,397 2,110	EPA State	B
K. Provide technical assistance to other Bureau programs. (subdivision water supply/contamination questions, PWS deviation requests, IP bed/lagoon monitoring, etc.)	As Needed	John (.05) Terry (.05) Tim (.05) Need .15 FTE	.15		4,931 2,110	EPA State	B
L. Develop and implement ground water data management system.	None	Need 1.0 FTE	0		0		C

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
M. Develop guidance documents to assist the public and regulated community. (permit application guide, clean up guide)	None	Need .01 FTE	0		0		C
SUBTOTALS		Need 8.19 FTE	2.34	41,900	61,144 46,240	EPA State	
OBJECTIVE III: Develop and implement a Wellhead Protection (WHP) program to protect the quality of ground water utilized by water supply systems.							
Activities: **Wellhead Protection**							
A. Coordinate WHP Public Advisory Committee and interagency technical committee to advise on plan development, implementation, and legislative strategy. (Quarterly meetings)	Jul, Oct 92 Jan, Apr 93	Carole	.15		7,396	EPA	A
B. Revise WHP Program as suggested by EPA. (Submit final program plan)	Oct.	Carole	.3		14,794	EPA	A
C. Update and implement a public awareness/education action plan for WHP. (1 - PSA, 2 - Survey, 3 - Newspaper article, 4 - distribute survey results, 5 - bumper sticker/sign contest)	1-Aug. 2-Nov. 3-Dec. 4-Mar. 5-May	Carole	.2		9,862	EPA	A
D. Maintain an information data base for WHP references and related programs.	Update monthly	Carole	.05		2,466	EPA	B
E. Oversee WHP program in communities receiving EPA demonstration grant funds and four school systems. (meet with communities and school)	Quarterly	Carole	.1	4,000	4,931	EPA	B
F. Coordinate with Missoula and Polson to implement WHP program and public education activities (meet every 2 months).	July, Sept., Nov. 92	Carole	.02		986	EPA	B
G. Conduct PWS vulnerability assessments. (Assess PWS for Clarks Fork Yellowstone River Valley WHP/AG project)	Dec. 92	Carole(.05) Carolyn (.04)	.09		4,438	EPA	B

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
H. Delineate WHPA for community water supplies. (Delineate PWS for Clarks Fork Yellowstone River Valley WHP/AG project)	Feb. 93	Carole (.04) Carolyn (.04)	.08		3,945	EPA	B
I. Develop and maintain GIS pollution source inventory system.	None	Need 1.5 FTE	0		0		C
SUBTOTALS		Need 1.5 FTE	.99	4,000	48,818	EPA	
OBJECTIVE IV: Develop and implement an agrichemical chemical in ground water protection program to comply with the requirements of the Montana Agricultural Chemical Ground Water Protection Act (MACGWPA) and to prevent contamination of ground water by agrichemicals. Develop and implement Nonpoint pollution demonstration and mapping projects.							
Activities: Agrichemical and Nonpoint							
A. Design and implement Nonpoint, Wellhead & Agrichemical demonstration project in the Clarks Fork Yellowstone River Valley. (1 - public meetings, 2 - data review, 3 - sampling, 4 - source inventory)	1 - Sept. 92, Mar. 93 2 - Oct. 92 3 - May 93 4 - Mar. 93	Carolyn	.52		25,642	EPA	A
B. Assist in writing pesticide General Management Plan development. (Write sections on standards and health effects)	Draft Oct. 92 Final Mar. 93	Carolyn	.2		9,862	EPA	A
C. Coordinate with Dept. Ag. to fulfill responsibilities under the MACGWPA. (1 - Finalize rules, 2 - compile and report pesticide detections, 3 Assist with sampling)	Draft Sept. 92, Final Jan 93	Carolyn (.03) WQD FTE (.35)	.38		15,000 1,479	MT-AG EPA	A
D. Oversee/review contracts. (1 - MSU GW-Pesticide BMP Compilation and Education Project and 2 - EPA Statewide Ground Water Assessment Prioritization Mapping)	Monthly review	Carolyn	.04		1,973	EPA	B
E. Draft pre-proposals for Nonpoint-Ground Water 319 Grant Projects	Aug. 92	Carolyn	.01		493	EPA	B

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
F. Participate in ground water - pesticide education programs.	Quarterly	Carolyn	.05		2,466	EPA	B
SUBTOTALS			1.20		41,915 15,000	EPA MT-AG	
OBJECTIVE V: Conduct oversight of special ground water pollution projects (BN fueling sites and Bozeman Solvent Site) in accordance with the Comprehensive Environmental Cleanup and Responsibility Act (CECRA) to ensure appropriate remediation of ground water.							
Activities: **Special Projects Oversight:**							
Burlington Northern Fueling Sites A. Coordinate with SHWB, public, BN, and contractors to facilitate cleanup at each BN fueling site. (Daily phone calls and letters)	Ongoing	Pat	.05		4,500	MT-EQPF	A
B. Conduct CECRA preliminary assessment of selected sites and determine need for RI/FS (Whitefish-July 92, Glasgow-Sept 92, Jones Junction-Nov. 92, Essex-Jan. 93)	Quarterly	Pat	.2		9,000	MT-EQPF	A
C. Conduct site inspections and collect environmental samples to document contamination and determine compliance with work plans. (24 inspections)	6 inspections 18 inspections	Pat Need .3 FTE	.15	11,000	6,750	MT-EQPF	B C
D. Review work plans and provide written comments. Evaluate reports to determine site status and compliance. (Annual work plans and reports)	Monthly	Pat	.1		4,500	MT-EQPF	A
Bozeman Solvent Site A. Coordinate with SHWB, citizen groups, PRPs and contractors to facilitate interim removal and monitoring activities. (Daily phone calls and letters)	Ongoing	Pat	.05		2,250	MT-EQPF	A
B. Conduct compliance inspections and collect environmental samples to determine site status and compliance (12 inspections)	6 inspections 6 inspections	Pat Need .2 FTE	.2	11,000	6,750	MT-EQPF	A C

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
C. Review work plans and provide written comments. Evaluate reports to determine site status and compliance. (Interim removal work plan/report and monthly reports)	Work plan July 92 Final report 93	Pat	.1		4,500	MT-EQPF	A
D. Respond to inquires, provide information to Citizens' Group and other parties and conduct public information meetings. (phone calls and letters, monthly meetings)	Ongoing	Pat Need .2 FTE	.13		5,850	MT-EQPF	B
E. Assist Agency for Toxic Substances and Disease Registry, DHES Epidemiology Bureau, and Gallatin Co. Health Dept. in conducting health risk assessment.	As needed	Pat	.02		900	MT-EQPF	B
SUBTOTALS		Need .7 FTE	1.0	22,000	45,000	MT-EQPF	
OBJECTIVE VI: Develop and implement the Water Quality Districts program to assist local governments in ground water pollution prevention.							
Activities: Water Quality Districts							
A. Develop rules for water quality district programs.	Draft July 92 Final Sept. 92	WQD FTE	.1		4,074	MT-WQD	A
B. Review WQD program applications and work with other counties to develop local districts. (Lewis & Clark Co. - Aug. 92, Missoula Co. Jan. 93)	Ongoing	WQD FTE	.2		8,150	MT-WQD	A
C. Disseminate information related to the establishment of Water Quality District and enhance coordination with the WHP program.	Ongoing	WQD FTE	.2		8,150	MT-WQD	B
SUBTOTALS			.5		20,374	MT-WQD	
OBJECTIVE VII: Develop and implement a Comprehensive Groundwater Protection Program. Assist in statewide coordination efforts to optimize use of state resources, exchange data and to identify and fill gaps.							
Activities: Comprehensive Ground Water Protection							

ACTIVITY (OUTPUT)	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Finalize Montana Profile in conjunction with Region VIII	Jan. 93	Carole	.06		2,959	EPA	B
B. Assess Profile for comparison with respect to Comprehensive Program guidance and identify deficiencies.		Carolyn	.02		986	EPA	
SUBTOTALS			.08		3,945	EPA	
TOTALS	Need 11.18 FTE	7.5 FTE			$245,115 111,578 20,374 15,000 $401,067	EPA State WQ District MT-AG	

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FTE FUNDING SUMMARY

State: 1 FTE @ $42,201, Total = 2.5 FTE (1.5 - GW Program, 1 - Enforcement) @ $111,578
EPA: 1 FTE @ $49,803, Total = 4 FTE @ $199,215 + Contract Services $45,900 = $245,115
EQPF: 1 FTE @ $45,000, Total = 1 FTE + Contracted Services $22,000 = $65,000
WQD: 1 FTE @ $41,449 (.5 FTE, WQD - $20,374; .35 FTE, AG - $15,000; .15 FTE, State - $6,075)

.02 FTE = 40 hours = 1 week

MUNICIPAL WASTEWATER ASSISTANCE PROGRAM

Fiscal Year 1993 Plan

Water Quality Bureau
Department of Health and Environmental Sciences

MUNICIPAL WASTEWATER ASSISTANCE SECTION

This section's primary activities are to provide financial and technical assistance to Montana communities to build wastewater treatment and collection facilities. The section provides financial assistance through the administration of the EPA Construction Grants program and the Montana State Revolving Fund program. The passage of the Federal Clean Water Act in 1972 created the Construction Grants program which has provided over 200 million dollars in Montana to build needed water pollution control facilities. The 1987 Amendments to the Act sunset the Grants program and concurrently created the new State Revolving Fund. The administration of the Grants program has been fully delegated to the state since the late seventies. The section has about 30 active grant projects which will be closed out over the next several years. Workplan tasks associated with these projects include reviewing the design and construction of grant-funded facilities. Administratively closing out grant projects which have completed construction is another major task of the section. The level of effort required to administer this program should remain stable over Fiscal Year 1993.

The new State Revolving Loan program provides low interest loans to communities to build wastewater projects in a manner similar to the Construction Grants program. The loan program will allow funding of some projects (i.e., storm sewers) which were not eligible under the Construction Grants program. All funds in the program must return to the fund in the form of loan repayments to provide a self-perpetuating form of financial assistance. While certain federal requirements are imposed on first-round loans, many will no longer apply after the funds revolve.

The Loan program made its first five loans in 1991 totaling 10.4 million dollars. Six new loans for a total of about 13 million dollars are scheduled in 1992. The administrative requirements inherent to loans has made this program significantly more complicated to manage than the Construction Grants program. The Montana Department of Natural Resources and Conservation and specialized financial consultants are used, under contract, for financial expertise in this program. As new loans are funded, administrative requirements will increase.

Needs in Montana for wastewater facilities will continue to grow. Projects selected for assistance must be placed on the annual Project Priority List which determines order of need according to severity of public health hazards or environmental problems. Currently, the greatest needs in Montana are for small unsewered communities which have failing septic systems and need a centralized sewer system. Another significant need in this state relates to decaying infrastructure which needs updating or replacement. Increased user costs and affordability will be an issue that financial assistance programs and local governments must contend with in the future.

The proper operation and maintenance of existing facilities, especially as they age and approach design life, will require an increased level of attention from the WQB in the form of operator/administrator training and plant inspection. The Municipal Wastewater Assistance Section, in conjunction with Northern Montana College, directs the Montana Environmental Training Center which is partially funded with federal construction grants assistance (109 (b) funds). The Training Center's primary mission is to provide operators and managers with

training and technical assistance in all aspects of facility operations. A restructured wastewater treatment plant inspection program is being implemented through this section's technical assistance program with the goal of identifying existing and potential performance-limiting factors at wastewater facilities. The goal here is to visit all municipal treatment facilities every three-to-five years.

The state has successfully competed for the EPA funded Municipal Water Pollution Prevention grant and will begin activities in Fiscal Year 1992 to complete the scope of work identified under the grant proposal. The purpose of the grant is to allow states to develop and implement pilot programs which will prevent new sources of pollution and encourage waste minimization at wastewater treatment facilities.

Other technical assistance provided includes holding workshops, water schools and on-site assistance to help operators or administrators better understand the regulations as well as proper operation and maintenance procedures. The new Part 503 federal sludge regulations will be finalized in July of 1992. The section will assist communities in understanding these new requirements as well as compliance with the technical requirements.

Contact for this program is Scott R. Anderson, Program Manager, telephone (406) 444-2406.

MUNICIPAL WASTEWATER ASSISTANCE PROGRAM
Fiscal Year 1993 Plan

MISSION STATEMENT:

TO PROTECT, ENHANCE, AND RESTORE MONTANA'S WATERS THROUGH THE PROVISION OF TECHNICAL OR FINANCIAL ASSISTANCE TO MUNICIPAL WATER POLLUTION CONTROL FACILITIES.

FINANCIAL ASSISTANCE PROGRAM OBJECTIVES:

I. Provide effective program administration.

II. Close out the Construction Grants Program as per the 1991 Closeout Strategy and annual state workplan.

III. Implement the new State Revolving Loan Fund Program as per the Operating Agreement between EPA and the bureau.

ACTIVITIES:

I. **Administration**

A. Conduct administrative duties necessary for program maintenance and development, develop and track budgets and contracts, write reports, and conduct program planning.

B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.

C. Provide administrative support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.

D. Promote consistent work methods among section staff.

II. **Construction Grants Program Management**

A. Provide projections for outlays and obligations to EPA on an annual basis.

B. Review facility plans for seven (7) active projects. Provide advance of allowance grants for four (4) new planning projects.

C. Review designs for five (5) grant-funded projects. Coordinate Nondegradation policy issues concerning these projects with Permits Section.

D. Manage projects which are currently in construction. Initiate operations at eight (8) projects.

E. Administratively complete nine (9) projects where construction is complete and performance standards are satisfied.

F. Obtain positive performance certifications from about seven (7) projects.

G. Complete annual Needs Survey.

H. Perform periodic MBE/WBE activities.

III. State Revolving Loan Fund Program

A. Close six (6) loans prior to the end of the planning period. Likely borrowers include:

Missoula Reserve	Missoula NW Broadway
North Bigfork	Evergreen
West Shore	Great Falls S.Sewer

Manage all projects in accordance with program documents developed under the capitalization grant received in September of 1990 and May of 1992.

B. Hire and train fiscal officer (Accountant II) to administer financial aspects of the SRF program. Utilize individual to minimize financial activities currently performed by project engineers.

C. Assist EPA's contracted consultant in the development of specification inserts to incorporate all federal and state program requirements in one document.

D. Review SRF Handbook of Procedures developed for the program and make adjustments to the document to improve its usefulness.

E. Finalize water/wastewater needs survey prepared under contract with Robert Peccia and Associates. Add missing information not obtained in initial survey. Using the data base, develop affordability criteria which will be considered when determining the interest rates for loan projects.

F. Provide input to our congressional delegation on adjustments to the SRF program during the reauthorization process currently underway for the Clean Water Act.

G. Actively market the SRF program to communities throughout the state. Develop an informational brochure to advertise the program.

H. Revise the SRF application to make the document more informational and user friendly.

I. Improve staff knowledge of public finance.

TECHNICAL ASSISTANCE PROGRAM OBJECTIVES:

I. Provide effective program administration.

II. Assist wastewater facility operators and administrators in plant operations.

III. Develop a Pollution Prevention Program based on the current process used to evaluate wastewater treatment facilities.

IV. Utilizing the final Federal Part 503 Regulations, develop a regulatory program for the use and disposal of municipal sewage sludge.

V. Review plans and specifications.

VI. Develop and implement a small community outreach program.

VII. Develop a public education program to improve the understanding of the need for wastewater treatment.

ACTIVITIES:

I. Administration

A. Conduct administrative duties necessary for program maintenance and development, develop and track budgets and contracts, write reports, and conduct program planning.

B. Supervise, assign duties, fill positions, train, monitor and evaluate staff. Hire one new FTE for pollution prevention activities and to assist in implementation of a new program to regulate sludge.

C. Provide administrative support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.

II. WWTP Operator Assistance

A. Provide statewide training at regional sites to wastewater professionals on plant operations, management and regulatory requirements. Prepare training materials regarding the history and rationale behind water pollution control laws.

B. Assist operators on-site in response to a specific request for assistance or as follow-up to an identified permit compliance problem. Estimate about 15 visits annually.

C. Jointly manage the Montana Environmental Training Center (METC) in conjunction with Northern Montana College (NMC). Provide direction and support to training coordinator hired for METC activities.

D. Jointly sponsor the annual water/wastewater operators school with Montana State University including logistical support and speaking at the school. Assist the METC coordinator in the sponsoring of a spring water school designed for small communities.

E. Provide in-house training to staff on plant operations and other technical wastewater topics. Utilize a video camera for this purpose.

F. In conjunction with the Public Water Supply Program, assist in preparation and distribution of the Big Sky Clearwater.

G. Obtain training in public speaking and making presentations. Utilize appropriate audio/visual aids. When preparing for presentations, assemble slides and narrative into training modules suitable for use by all staff in making presentations.

III. Pollution Prevention Program

A. Develop a new pollution prevention program consistent with the February 12, 1992 grant proposal submitted to the EPA. Key elements of this proposal include:

i. Evaluate 10-15 systems annually looking at plant operations, design, and administration.

ii. Identify existing and potential performance-limiting factors. Provide report.

iii. Work with facility administrators to address factors through O&M training and/or capital improvements. Direct municipalities in obtaining needed technical or financial assistance. Follow-up on these activities to see that important concerns raised during the evaluation are being addressed.

iv. Evaluate user charge systems in conjunction with plant evaluations to determine the financial condition of the wastewater utility.

B. Perform periodic inspections of approximately 25 systems annually. Employ practices to support pollution prevention as part of these inspections.

C. Direct NMC 104(g) trainer to communities requiring operational assistance following a CPE or inspection, where section staff cannot provide these services.

VI. Sludge Program

A. Review the new federal standards and become familiar with their requirements. In conjunction with the Permits Section, develop state rules if necessary to implement the federal standards.

B. Design a generic sludge management plan for communities to follow for beneficial reuse of sewage sludge.

C. Inventory existing sludge handling methods. Working with the Permits Section, determine which facilities are not in compliance with the new regulations. Notify these facilities and negotiate a compliance schedule.

D. Assist Butte in the elimination of their dedicated sludge disposal system. Seek a replacement system which utilizes the sludge for beneficial uses.

E. Clarify our responsibilities and those of the SHWB regarding the composting of wastewater sludges.

V. Plan and Specification Review

A. Review project plans and specifications for facilities not funded with construction grants or state revolving loan fund assistance. Coordinate Nondegradation policy issues concerning these projects with Permits Section.

B. Evaluate the 1990 Edition of 10 States Standards used to evaluate wastewater project plans and create a Montana version based on this document.

C. Participate on the WQB Deviation Review Committee which considers variances from the 10 States Standards.

D. Develop design standards for stormwater treatment and disposal systems.

E. Maintain a knowledge of current and new technologies through training, references and contact with professionals in the field. In particular, gain insight in the utilization of natural systems for treatment of domestic wastewater.

F. Develop process for review of the engineering aspects of industrial wastewater systems. Implement rule-making where necessary.

VI. Small Community Outreach Program

A. Identify small communities with known needs. Contact these towns and offer outreach help which consists of technical and financial assistance. Hold workshop to assist these communities in planning and financing wastewater facilities. Educate administrators in the process of hiring technical consultants.

B. Help communities initiate the planning process including the use of EPA funded advance of allowance grants.

C. Working with other state and federal financial assistance agencies, introduce communities to available forms of help.

D. In conjunction with the reauthorization of the Clean Water Act, work with our congressional delegation and other agencies to promote a financial assistance program designed for small, needy communities.

E. Develop a self-help program for small communities.

F. Scope problem for towns and identify realistic alternatives.

VII. Public Education Program

A. Prepare a training module on wastewater treatment and present this publicly (i.e., local schools).

B. Work with operators and administrators encouraging them to use the module for public education.

C. Develop or obtain materials to distribute to the public to promote understanding of wastewater treatment.

D. Interface with the WPCF/AWWA Public Information Committee regarding their activities.

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Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
MUNICIPAL WASTEWATER ASSISTANCE PROGRAM - Fiscal Year 1993 Plan							
MISSION STATEMENT: **To protect, enhance, and restore Montana's waters through the provision of financial or technical assistance to municipal water pollution control facilities.**							
GOAL #1: Administer the Financial Assistance Program.							
OBJECTIVE #1: Provide effective program administration.							
Activities:							
A. Conduct duties necessary for program maintenance and development, develop and track budgets, write reports, and conduct program planning.	Ongoing	Anderson & Fraser	.25	0	12,783	205(G) or SRF	A
B. Supervise, assign duties, fill positions, train, monitor and evaluate staff.	Ongoing	Anderson & Fraser (.3 FTE needed)	.2	0	10,227	205(G) or SRF	A
C. Provide administrative support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.	Ongoing	Reeves Adm. Aide	1.3	0	66,472	205(G) or SRF	A
D. Promote consistent work methods among section staff.	Ongoing	Anderson	.05	0	2,557	205(G) or SRF	A
SUBTOTALS		3 FTE needed	1.80	0	92,039		0
OBJECTIVE #2: Construction Grants Program Management							
Activities:							
A. Provide projections for outlays and obligations to EPA on an annual basis.	Summer '93	Reeves	.1	0	5,113	205(G)	A

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
B. Review facility plans for seven (7) active projects. Provide Advance of Allowance grants for four (4) new planning projects.	Ongoing	Staff	.4	0	20,453	205(G)	A
C. Review designs for five (5) grant funded projects. Coordinate Nondegradation policy issues concerning these projects with Permits Section.	Ongoing	Staff	.5	0	25,567	205(G)	A
D. Manage projects currently in construction. Initiate operations at eight (8) projects.	Ongoing	Staff	.8	0	40,906	205(G)	A
E. Administratively complete nine (9) projects where construction is complete and performance standards are satisfied.	Ongoing	Staff	.3	0	15,340	205(G)	B
F. Obtain positive performance certifications from approximately seven (7) projects.	Ongoing	Staff	.13	0	6,647	205(G)	B
G. Complete annual Needs Survey.	By 8/92	Reeves	.02	0	1,023		
H. Perform periodic MBE/WBE activities.	Quarterly	Reeves	.01	0	511		
SUBTOTALS			2.26	0	115,560		
OBJECTIVE #3: Administer State Revolving Fund Loan Program							
Activities:							
A. Close six (6) loans prior to the end of the planning period. Likely borrowers include: Missoula Reserve, North Bigfork, Westshore, Missoula NW Broadway, Evergreen, and Great Falls Storm Sewer. Manage all projects in accordance with program documents developed under the capitalization grant received 9/90.	Ongoing	Staff DNRC Dorsey & Whitney First Trust DAD - PJH	1.88	0 18,000 35,000	96,130	SRF	A

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
B. Hire and train fiscal officer (Accountant II) to administer financial aspects of the SRF program. Utilize individual to minimize financial activities currently performed by project engineers.	Ongoing	Anderson J. Hanson	.05	0	2,557	SRF	A
C. Assist EPA's contracted consultant in development of specification inserts to incorporate all federal and state program requirements into one document.	Upon submittal by contractor	Slovarp	.05	0	2,557	SRF	B
D. Review SRF Handbook of Procedures and make revisions to improve its usefulness.	Ongoing	Staff	.05	0	2,557	SRF	B
E. Finalize water/wastewater needs survey prepared under contract with Robert Peccia and Associates. Add missing information not obtained in initial survey. Using the database, develop affordability criteria to be considered in determining interest rates for loan projects.	By 12/92	Accountant II	.15	0	7,670	SRF	B
F. Provide input to our congressional delegation on adjustments to the SRF program during the reauthorization process currently underway for the Clean Water Act.	As needed	Anderson	.05	0	2,557	SRF	A
G. Actively market the SRF program to communities throughout the state. Develop an informational brochure to advertise the program.	Ongoing	Accountant II Staff	.15	0	7,670	SRF	A
H. Revise the SRF application to make the document more informational and user friendly.	By 12/92	Accountant II	.05	0	2,557	SRF	A
I. Improve staff knowledge of public finance.	Ongoing	Staff	.05	0	2,557	SRF	B
SUBTOTALS			2.48	53,000	126,812		
SUBTOTAL FOR FINANCIAL ASSISTANCE PROGRAM		.3 FTE needed	6.54	53,000	334,411		

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Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
GOAL #2: Administer the Technical Assistance Program							
OBJECTIVE #1: Provide effective program administration.							
Activities:							
A. Conduct administrative duties necessary for program maintenance and development, develop and track budgets and contracts, write reports, and conduct program planning.	Ongoing	Anderson & Fraser	.15	0	7,670	205(G)	A
B. Supervise, assign duties, fill positions, train, monitor and evaluate staff. Hire one new FTE for pollution prevention activities and to assist in implementation of a new program to regulate sludge.	Ongoing	Anderson & Fraser (.3 FTE needed)	.1	0	5,113	205(G)	A
C. Provide administrative support services to program including managerial, wordprocessing, data entry, report generation, mailings, etc.	Ongoing	Reeves Adm. Aide	.4	0	20,453	205(G)	A
SUBTOTALS		.3 FTE needed	0.65	0	33,236		
OBJECTIVE #2: Provide WWTP Operator assistance.							
Activities:							
A. Provide statewide training at regional sites to wastewater professionals on plant operations, management, and regulatory requirements. Prepare training materials regarding the history and rationale behind water pollution control laws.	Ongoing	Staff (.2 - .3 FTE needed)	.1	0	5,113	205(G)	A
B. Assist operators on-site in response to a specific request for assistance or as follow-up to an identified permit compliance problem. Estimate 15 visits annually.	Ongoing	Environ. Spec. (.3 - .5 FTE needed)	.1	0	5,113	205(G)	B

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
C. Jointly manage the Montana Environmental Training Center (METC) in conjunction with Northern Montana College (NMC). Provide direction and support to training coordinator hired for METC activities.	Ongoing	Boyle Anderson Environ. Spec.	.5 .1 .15	0	25,567 5,113 7,670	205(G)	A
D. Jointly sponsor the annual water/wastewater operators school with Montana State University including logistical support and speaking at the school. Assist the METC coordinator in sponsoring a spring water school designed for small communities.	9/92 4/93	Environ. Spec. (.1 FTE needed)	.05	0	2,557	205(G)	A
E. Provide in-house training to staff on plant operations and other technical wastewater topics, utilizing a video camera.	Ongoing	Staff (.1 FTE needed)	.03	0	1,534	205(G)	B
F. In conjunction with the Public Water Supply Program, assist in preparation and distribution of the Big Sky Clearwater.	8/92 and 2/93	Environ. Spec. Reeves Adm. Aide	.01 .01 .02	0	511 511 1,023	205(G)	B
G. Obtain training in public speaking and making presentations. Utilize appropriate audio/visual aids. When preparing for presentations, assemble slides and narrative into training modules suitable for use by all staff.	Ongoing	Staff (.1 FTE needed)	0	0		?	C
SUBTOTALS		.8 - 1.1 FTE needed	1.07	0	56,712		
OBJECTIVE #3: Administer Pollution Prevention Program							
Activities:							

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
A. Develop a new pollution prevention program consistent with 2/12/92 grant proposal submitted to EPA. Key elements of the proposal include: 1) evaluate 10 - 15 systems annually looking at plant operations, design, and administration; 2) identify existing and potential performance-limiting factors, provide report; 3) work with facility administrators to address factors through O&M training and/or capital improvements; direct municipalities in obtaining needed technical or financial assistance; follow-up on these activities to see that important concerns raised during evaluation are addressed. 4) evaluate user charge systems in conjunction with plant evaluations to determine the financial condition of the wastewater facility.	Ongoing	Staff (New FTE requested by budget amend.)	.2 .3	3,000	10,227 15,340	205(G) PPG (Pollution Prevention Grant, special $50,000 grant to be received by 7/92)	A
B. Perform periodic inspections of approximately 25 systems annually. Employ practices to support pollution prevention as part of these inspections.	Ongoing	Staff (New FTE)	.1 .3	0	5,113 15,340	PPG	B
C. Direct NMC 104(g) trainer to communities requiring operational assistance following a CPE or inspection, where section staff cannot provide these services.	Ongoing	Environ. Spec.	.05	0	2,557	PPG	B
SUBTOTALS			0.95	3,000	48,577		
OBJECTIVE #4: Administer Sludge Program							
Activities:							
A. Review the new federal standards and become familiar with requirements. In conjunction with the Permits Section, develop state rules if necessary to implement the federal standards.	7/92 thru 12/92	Anderson LaVigne (.5 FTE needed)	.05 .05	0	2,557 2,557		A

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
B. Design a generic sludge management plan for communities to follow for beneficial reuse of sewage sludge.	By 3/93	LaVigne (New FTE)	.05	0	2,557		B
C. Inventory existing sludge handling methods; work with Permits Section to determine which facilities are not in compliance with the new regulations; notify these facilities and negotiate a compliance schedule.	By 5/93	(New FTE)	.05	0	2,557		B
D. Assist Butte in the elimination of its dedicated sludge disposal system; seek a replacement system which utilizes the sludge for beneficial uses.	?	(.05 FTE) needed	0	0			C
E. Clarify our responsibilities and those of SHWB regarding the composting of wastewater sludges.	By 9/92	(.05 FTE needed)	0	0			C
SUBTOTALS		.6 FTE needed	0.20	0	10,228		
OBJECTIVE #5: Review Plans and Specifications							
Activities:							
A. Review project plans and specifications for facilities not funded with construction grants or state revolving fund loan assistance. Coordinate Nondegradation policy issues concerning the projects with Permits Section.	Ongoing	Staff Engineers	.05	0	2,557	P & S Fees	B
B. Evaluate the 1990 Edition of Ten States Standards used to evaluate wastewater project plans and create a Montana version based on this document.	By 8/92	Staff Engineers	.05	0	2,557	205(G)	A
C. Participate on the WQB Deviation Review Committee which considers variances from the Ten States Standards.	Ongoing	Slovarp	.07	0	3,579	205(G) or P & S Fees	A
D. Develop design standards for stormwater treatment and disposal systems.	By 6/93	LaVigne	.05	0	2,557	SRF	B

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
E. Maintain a knowledge of current and new technologies through training, references, and contact with professionals in the field; in particular, gain insight into the utilization of natural systems for treatment of domestic wastewater.	Ongoing	Staff	.05	0	2,557	205(G)	B
F. Develop a process for review of the engineering aspects of industrial wastewater systems; implement rulemaking where necessary.	?	Anderson (.6 FTE needed)	0	0			C
SUBTOTALS		.6 FTE needed	0.27	0	13,807		
OBJECTIVE #6: Administer Small Community Outreach Program							
Activities:							
A. Identify small communities with known needs; contact and offer outreach help consisting of technical and financial assistance; hold workshop to assist communities in planning and financing wastewater facilities; educate administrators in the process of hiring technical consultants.	Ongoing	Sanchez Staff (.3 FTE needed)	.05	0	2,557	SRF or 205(G)	A
B. Help communities initiate the planning process including use of EPA funded advance of allowance grants.	Ongoing	Staff	.05	0	2,557	SRF or 205(G)	A
C. Working with other state and federal financial assistance agencies, introduce communities to available forms of help.	Ongoing	Staff (.1 FTE needed)	.01	0	511	205(G)	B
D. In conjunction with the reauthorization of the Clean Water Act, work with our congressional delegation and other agencies to promote a financial assistance program designed for small, needy communities.	Ongoing	Anderson	.01	0	511	205(G)	A

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACT SERVICES	FUNDS	FUNDING SOURCE(S)	
E. Develop a self-help program for small communities.		(.1 FTE needed)	0	0		?	C
F. Scope problem for towns and identify realistic alternatives.		(.2 FTE needed)	0	0		?	C
SUBTOTALS		.7 FTE needed	0.12	0	6,136		
OBJECTIVE #7: Administer Public Education Program							
Activities:							
A. Prepare a training module on wastewater treatment and present this publicly (i.e., local schools).		(.25 FTE needed)	0	0		?	C
B. Work with operators and administrators encouraging them to use the module for public education.		(.05 FTE needed)	0	0		?	C
C. Develop or obtain materials to distribute to the public to promote understanding of wastewater treatment.		(.15 FTE needed)	0	0		?	C
D. Interface with the WPCF/AWWA Public Information Committee regarding its activities.		(.02 FTE needed)	0	0		?	C
SUBTOTALS		.47 FTE needed	0.00	0	0		
SUBTOTAL FOR TECH. ASSISTANCE PROGRAM		3.47 - 3.77 FTE needed	3.26	3,000	166,696		
GRAND TOTAL		3.77 - 4.07 FTE needed	9.80	56,000	501,107		0

Program Technical Assistance Program Fiscal Year 1993 By Scott Anderson

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Staffing = 9.8 FTE's
Cost/FTE = $51,133

Program Revenues:	C. Grants	$406,885	
	109(b)	20,882	
	SRF	48,374	(excludes $53,000 contr. services)
	PP Grant	25,000	(excludes $3,000 contr. services)
		$501,141	

Priorities are defined as follows:

A. Absolutely essential to accomplish within the time indicated in order to accomplish mission.
B. Important, but not essential to mission; could be delayed if necessary.
C. High priority objectives or activities for which resources are currently unavailable; same as "A" priorities except they are unfunded.

DRINKING WATER PROGRAM

FISCAL YEAR 1993 PLAN

WATER QUALITY BUREAU

Department of Health and Environmental Sciences

DRINKING WATER PROGRAM

The first Montana Public Water Supply law was enacted in 1907. This law was revised in 1977, 1979 and 1991 to enable Montana to receive and retain delegation for the administration of the Federal Safe Drinking Water Act (SDWA) (PL 93-523). In the past year, the program has adopted and received primacy for the Total Coliform Rule, the Surface Water Treatment Rule, the Public Notification Rule and the Phase I rule. Also, the 1991 changes in the law allowed DHES to:

- Develop a fee schedule to assess service connection fees to recover costs in administering the law. In November of 1991, the Board of Health and Environmental Sciences adopted the rules that establish the fee collection procedures. About $530,000 in revenue was collected in FY 1992. The fees will allow the program to add up to 5.75 FTE to the staff, and,

- Develop fees to pay for costs in review of plans and specifications for public water and wastewater systems. This fee schedule is proposed to be acted upon by the BHES at their July 17, 1992 meeting, and,

- Develop administrative order procedures with provisions for penalties up to $500 per day, and authority to assess civil penalties up to $10,000 per day, and,

- Develop rules for review of financial viability of proposed water supply systems and public wastewater systems.

The program regulates all public water supplies (PWSs). PWSs are those supplies which have at least 10 service connections or serve 25 people per day for 60 or more days per year. The inventory of Montana's PWSs varies in number but currently includes 725 community systems, 1,179 transient noncommunity systems and 224 non-transient non-community systems. There are also 370 "inactive" PWSs.

The state's drinking water quality is considered generally good in western Montana. Many PWSs in eastern Montana have a high mineral content, especially groundwater supplies. These mineral problems are generally not a public health threat. Problems include high dissolved solids, sulfates, sodium, iron and manganese. Some of the surface water supplies in the western part of the state still use surface sources without filtration and occasionally have turbidity problems. Several new treatment plants have been constructed in the past few years that eliminate the worst turbidity problems. Some water supplies still have difficulty meeting coliform bacteria maximum contaminant levels (MCLs).

Several systems have exceeded the MCL for nitrate. The department requires these systems to provide bottled water from an approved source for infants and pregnant mothers and is working with these supplies to achieve long-term solutions. Most nitrate problems have been resolved through treatment or blending with low-nitrate water.

Montana has about 9 community supplies that exceed 4.0 mg/1 in fluoride. These systems are required to give public notice and provide bottled water for those who prefer it. The department has been working with these systems in order to find an affordable solution to the fluoride problem. Recently EPA has issued administrative orders to some of the systems whose fluoride levels exceed 5.0 mg/l.

Unfiltered surface water has been one of the state's major concerns for the past several years. Outbreaks of giardiasis have been experienced here as in other states. The public water supply program is taking action to see that the risk from Giardia and other waterborne pathogens is minimized. The program has a person on staff who specializes in the area of Giardia filtration and control. Each surface system is investigated and recommendations are made to assure that safe water is delivered to the consumers. When a supply cannot assure removal or inactivation of waterborne pathogens, boil orders or health advisories are issued by the department. Investigations may include a procedure known as the microscopic particulate evaluation (MPE). An MPE analyzes the microscopic content of the water. This procedure has been a particularly valuable tool for evaluating filter plant performance. As time permits, program staff also investigate shallow wells and springs to determine whether they are influenced by surface water.

Over the past several years, the program has developed a detailed method of evaluating all aspects of the performance of water filtration plants. The method is patterned after the wastewater industry's Comprehensive Performance Evaluation (CPE) process. CPEs have been performed on at least 13 of Montana's surface water treatment plants. Composite Correction Programs (CCPs) are a follow-up technical assistance effort directed at plants that have problems that were identified during a CPE. CCP's have been completed at Miles City, Conrad and Loma. The CPE/CCP program is relatively new to the drinking water industry and there has been a great deal of interest shown by other states, American Water Works Association (AWWA), AWWA Research Foundation, Association of State Drinking Water Administrators (ASDWA) and the Environmental Protection Agency (EPA). EPA's Office of Research and Development and Office of Drinking Water are currently working together to fund additional CPEs and CCPs to further the work begun by Montana. The work completed in Montana and more recently in a few other states has been used by EPA's Center for Environmental Research Information to develop a "Summary Report" titled Optimizing Water Treatment Plant Performance With The Composite Correction Program (EPA/625/8-90/017). An EPA handbook has also been distributed nation-wide.

The majority of the state's community public water supplies are regularly monitoring for bacterial quality but many of them miss required samples. Bacterial contamination occurs at least one time per year in about 50% of our systems. When the MCL for coliform bacteria is exceeded, program staff work with the PWS personnel to identify the problem and solve it. One staff member acts as the lead in resolving MCL violations and in providing public notification. Several groundwater supplies with bacterial problems have had to put in full-time disinfection over the past few years and many more should have enforcement actions taken to ensure that disinfection is installed. The ground water disinfection

requirements of the 1986 Amendments to the SDWA should have a positive impact if adequate resources become available for implementation. The new administrative order authority available to the program should also increase compliance significantly.

The local area network system of IBM computers (PCs) is now on line and is becoming more and more useful. All staff members have access to the bacteriological sample database and other databases. Programs have been written to compute monthly compliance using the new total coliform regulations. Turbidity and organic data can be entered into the system now, but compliance determinations cannot yet be made. Programming efforts are currently underway for the Phase II, Phase V and Lead and Copper Rules.

Priority objectives for FY 1993 include:

-provide for more effective formal and informal enforcement of current requirements,
-develop rules for plan review fees,
-complete CPEs at 4 filtration plants,
-improve the bacteriological quality of those PWS's that have coliform problems or high standard plate counts,
-conduct field investigations at 40% of the state's PWS's,
-provide training and certification of water and wastewater operators of community PWSs,
-improve the state's operator training and certification program using information gained from CPEs and CCPs,
-provide for more efficient and effective review of plans and specifications for construction on public water and sewer systems,
-adopt new design standards for review of plans and specifications
-delegate plan review authority to local governments as appropriate,
-investigate all PWS's that could be at risk for Giardia, do evaluations and make recommendations to see that the risk is minimized,
-continue to update the data management system to improve FRDS reporting capabilities,
-prepare extension requests for Phase II and Lead and Copper Rules,
-begin implemenation of Phase II/V and Lead and Copper Rules,
-coordinate activities with the department's Wellhead Protection Program.
-collect samples and provide analysis for organic contaminants at community and non-transient non-community systems (as funding is available).

Program DRIP G WATER Fiscal Year 1993 By MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL I: Develop new rules and rule changes to allow effective program growth and implementation.							
Objective 1: Draft Viability Rule	12/31/92	Mark, Dave	0.08	0.00	4,355	EPA/RIT	A
Objective 2: Lead and Copper Draft Rule	03/31/93	Roy, Dave	0.07	0.00	3,810	EPA/RIT	B
Objective 3: Phase I, II & V Draft Rule	03/31/93	Gary, Dave	0.08	0.00	4,355	EPA/RIT	B
Objective 4: Current Rule Housekeeping Revisions	03/31/93	Donna	0.01	0.00	544	EPA/RIT	A
Objective 5: Draft Cross-Connection Control Program Rule	10/31/92	Marc, Dave	0.07	0.00	3,810	EPA/RIT	B
Objective 6: Obtain extension agreements with EPA for Phase II and Lead & Copper rules	12/31/92	Dave, Gary, Roy	0.02	0.00	1,089	EPA/RIT	A
SUBTOTAL			0.33	0	$17,963	$13,472EPA $ 4,491RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRII G WATER Fiscal Year 1993 By MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL II: Prepare for hiring of additional staff							
Objective 1: Prepare position description for Hydrogeologist and Engineer.	07/15/92	Dave	0.01	0.00	544	EPA/RIT	A
Objective 2: Prepare position descriptions for Environmental Specialist II and Program Assistant.	07/15/92	Donna	0.01	0.00	544	EPA/RIT	A
Objective 3: Revise Polson Environmental Specialist Position Description.	07/01/92	Donna	0.01	0.00	544	EPA/RIT	A
SUBTOTAL			.03	0	$1,632	$1,224 EPA $ 408 RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,412

Program DRIN 3 WATER Fiscal Year 1993 By MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL III: Effectively administer day-to-day PWSP duties and coordinate activities between work units.							
Objective 1: Develop draft of Program Plan for FY 1994.	05/01/93	Jim, Dave, Donna	0.03	0.00	1,089	EPA/RIT	A
Objective 2: Develop Annual Work Plans for Engineering and Field Services Programs.	07/15/93	Dave, Donna	0.03	0.00	1,633	EPA/RIT	A
Objective 3: Project and track expenditures closely to insure grant and fee income is adequate for program operations; make projections for upcoming fiscal years.	Ongoing	Dave, Donna, Jim	0.05	0.00	2,722	EPA/RIT	A
Objective 4: Hold monthly section meetings.	Ongoing	PWS Staff	0.15	0.00	8,165	EPA/RIT	A
			0.11		5,988	FEES	
Objective 5: Implement performance standards and perform quarterly performance evaluations.	Ongoing	Dave, Donna	0.18	0.00	9,798	EPA/FIT	B
			0.05		2,722	FEES	
Objective 6: Weekly Bureau and PWSP section managers meetings.	Ongoing	Dan, Dave, Donna, Jim	0.35	0.00	16,330	EPA/FIT	A
Objective 7: Miscellaneous manager responsibilities.	Ongoing	Dan, Dave, Donna, Jim	0.45	0.00	16,330	EPA/RIT	A
Objective 8: Meet quarterly with MRWA, MAP and regional offices of WQB.	Ongoing	PWS Staff	0.11	0.00	5,988	EPA/RIT	B
			0.05		2,722	FEES	
SUBTOTAL			1.56	0	$73,487	$46,541 EPA $15,514 RIT $11,432 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRIP 1 WATER Fiscal Year 1993 By MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL IV: Conduct Sanitary Surveys of Public Water Systems and Small Wastewater System Inspections.							
Objective 1: Helena Office to conduct approximately 80 water system sanitary surveys and 25 wastewater inspections. **Objective 1a.:** Conduct regular field visits at water and wastewater facilities not mentioned in 1 above.	ongoing	PWS Staff Need 0.5 FTE ($27,216)	.60	0.00	32,659	EPA/RIT	A C
Objective 2: Provide for regular sanitary surveys and water sampling of small community systems through the administration of county contracts.	Ongoing	PWS Staff	.10		5,443	EPA/RIT	A
				50,000		EPA/RIT	
Objective 3: Provide for regular sanitary surveys and water sampling of small community water systems through the administration of contracts with private consultants.	Ongoing	Dave, PWS Staff	.05		2,722	EPA/RIT	A
				65,000		FEES	
SUBTOTAL		Need 0.5 FTE ($27,216)	0.75	$115,000	$40,824	$ 80,618 EPA $ 10,206 RIT $65,000 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

June 25, 1992

Program DRIN 1 WATER Fiscal Year 1993 By MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL V: Provide training services to water and wastewater operators and mangers and to the general public to facilitate better operation and maintenance of public water and wastewater facilities and better understandiog of the public health aspects of public water supplies.							
Objective 1: Conduct annual water and wastewater operator school in Bozeman.	10/05/92 to 10/09/92	Field Serv. et.al	0.11	0.00	5,988	EPA/RIT	A
			0.20		10,886	FEES	
Objective 2: Conduct 15 additional days of training activities sponsored by the WQB or METC.	Ongoing	Field Serv. et.al	0.20	0.00	10,886	EPA/RIT	A
Objective 2a: Conduct an additional 8 days of training sponsored by WQB and/or METC.		Need 0.3 FTE ($16,330)	0.36		19,596	FEES	C
Objective 3: Develop training materials to interpret existing PWSP rules and TCR, SWTR, PN, VOC's and lead and copper rules to the regulated public.	01/01/92	Field Serv. et.al	0.04	0.00	3,266	EPA/RIT	B
			0.06		4,899	FEES	
Objective 4: Provide training for contracted sanitarians.	Annually	Field Serv. et.al	0.06	0.00	3,266	EPA/RIT	B
			0.04		2,177	FEES	
Objective 5: Prepare 1993 METC annual training calendar for water and wastewater operators.	10/01/92	Field Serv.	0.01	0.00	544	EPA/RIT	A
			0.03		1,633	FEES	
Objective 6: Provide training for engineering plan review for contracted local governments and delegated agencies.		Eng. Serv.	0.05	0.00	2,722	FEES	B
Objective 7: Develop training materials on the purpose and public health implications of the SDWA and operator certification programs.	08/15/92	Field Serv.	0.02	0.00	1,089	EPA/RIT	A
			0.03		1,633	FEES	
SUBTOTAL		Need 0.3 FTE ($16,330)	1.21	0	$68,585	$18,779 EPA $ 6,260 RIT $43,546 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRIP G WATER Fiscal Year 1993 By MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VI: Provide technical assistance to operators and managers of water and wastewater facilities to solve specific problems.							
Objective 1: Conduct 4 CPEs at surface water treatment plants.	Quarterly	PWS Staff	0.22	0.00	11,975	EPA/RIT	A
Objective 1a: Conduct an additional 2 CPE's and 1 CCP at surface water treatment plants		Need 0.4 FTE ($21,773)	0.18		6,798	FEES	C
Objective 2: Procure and implement contracted services to provide technical assistance to small systems.	08/01/92	Donne, Jim	0.06		3,266	EPA/RIT	A
				65,000		FEES	
Objective 3: Implement boil order/health advisory policy.	Ongoing	PWS Staff	0.30	0.00	16,330	EPA/RIT	A
			0.10		5,443	FEES	
Objective 4: Provide emergency response to contamination events in addition to boil orders.	As Needed	PWS Staff	0.06	0.00	3,266	EPA/RIT	A
			0.04		2,177	FEES	
Objective 5: Develop draft emergency response plan.	03/01/93	Field Serv	0.03	0.00	1,633	EPA/RIT	B
Objective 5a: Finalize and implement emergency response plan.		Need 0.12 FTE ($6,532)	0.03		1,633	FEES	C
Objective 6: Draft groundwater CPE approach objectives and factors.	06/30/93	PWS Staff, Need 0.12 FTE (6,532)	0.01	0.00	544	EPA/RIT	C
			0.02		1,089	FEES	
Objective 7: Provide general assistance and education to operators and the public.	Ongoing	PWS Staff	0.18	0.00	9,798	EPA/RIT	A
Objective 7a: Provide for additional general assistance to operators and the public.		Need 0.10 FTE ($5443)	0.27		14,697	FEES	C
TOTAL		Need 0.74 FTE ($40,280)	1.50	$65,000	$78,649	$35,109 EPA $11,703 RIT $96,837 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRIN : WATER Fiscal Year 1993 / MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VII: Provide for effective, efficient review of plans and specifications.							
Objective 1: Conduct 150+ reviews in the Helena Office. Coordinate review with Groundwater Program and Municipal Wastewater Assistance Section.	Ongoing	PWS Engineers 0.5 FTE Needed	1.4		76,205	EPA/RIT	A
Objective 2: Assist Wastewater Section with development of DHES Circular WQB2.	Ongoing	Roy, Gary & Dave	.10		5443	EPA/RIT	B
Objective 3: General maintenance of Design Standards; Development of Policy; Implementation of Deviation Process.	Ongoing	PWS Engineers	.12		6532	EPA/RIT	A
Objective 4: Review applications for delegation of Plan & Specification review to local governments and implement contracts.	Ongoing	PWS Engineers	.05		2722	EPA/RIT	A
Objective 5: Provide regular review of work performed by contracted local governments.		0.10 FTE Needed					C
SUBTOTALS		0.60 FTE Needed (32,659)	1.67		90,902	$68,176 EPA $22,726 RIT	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

Program DRINI WATER Fiscal Year 1993 y MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VIII: Develop and maintain data management system and provide clerical support for PWSP							
Objective 1: Develop software for PWSP							
1. Develop LCR tracking software	9/15/92	Pam, Joan	.04		3,265	EPA/RIT	A
2. Develop Phase II/V tracking software	11/15/92	Pam, Joan	.05		5,443	FEES	A
3. Develop inorganic tracking software (incl. nitrates)	1/1/93	Pam, Joan	.04		2,177	FEES	A
4. Develop turbidity and chlorine compliance software for surface water treatment plants	4/08/93	Pam, Joan	.06		1,633	FEES	B
5. Develop long term coliform MCL software	6/30/93	Pam	.00		1,633	FEES	B
6. Develop software for PWSP fees	1/1/93	Pam, Joan	.06		1,633	FEES	B
7. Develop AREV subset for Billings office	5/1/93	Pam, Joan	.06		1,089	FEES	B
8. Develop chlorine residual monitoring software		Need 0.05 FTE (2,722)					C
9. Develop sanitary survey tracking software		Need 0.05 FTE (2,722)					C
10. Provide AREV traning for Pam.							
SUBTOTAL		Need 0.10 FTE ($5,443)	0.31	0	$16,873	$ 2,449 EPA $ 816 RIT $13,608 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRIN' 1 WATER Fiscal Year 1993 by MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VIII: (continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 2: Maintain electronic database for PWSP							
1. Develop capability to import LIMS data	8/20/92	Pam, Joan	.04		2,177	EPA/RIT	A
2. Move inorganic data (incl. nitrates) from mainframe to PWSP PC system	2/1/93	Pam, Joan	.02		1,633	FEES	A
3. Move radiological data from mainframe	2/1/93	Pam	.00		1,089	FEES	B
4. Convert to AREV 2.1	3/5/93	Pam, Joan	.06		544	FEES	B
5. Develop method to archive AREV data	5/10/93	Pam, Joan	.04		1,633	FEES	B
6. Update FRDS for non-community systems	6/30/93	Pam, Joan	.02		2,177	FEES	B
7. Develop plan for labs to report electronically		Need 0.10 FTE (5,443)					C
SUBTOTAL		Need 0.10 FTE ($5,443)	0.18	0	$9,253	$1,633 EPA $ 544 RIT $7,076 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

1.00 FTE = $54,432

Program DRINKING WATER Fiscal Year 1993 y MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VIII: (Continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 3:							
1. Continue electronic FRDS reporting	On-going	Pam, Joan	.02		2,722	EPA/RIT	A
2. Generate chemical and inventory printouts for counties	9/7/92	Pam, Joan	.02		1,089	FEES	A
3. Assist with TCR compliance determinations for routine compliance efforts	On-going	Joan	.02		3,266	FEES	A
4. Continue submitting data to mainframe	On-going	Joan	.04		2,177	FEES	A
5. Enhance coliform enforcement letters	9/21/92	Pam, Joan	.08		1,089	FEES	B
6 Develop data verification/validation plan		Need 0.10 FTE (5,443)					C
7. Write data flow manual for PWSP		Need 0.10 FTE (5,443)					C
SUBTOTAL		Need 0.2 FTE ($10,886)	0.18	0	$10,343	$2,042 EPA $ 680 RIT $7,621 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

Program DRINF ' WATER Fiscal Year 1993 f MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VIII: (Continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 4: Provide other technical and clerical support							
1. Provide data base technical support, generate reports for A and B priority activities.	On-going	Joan	.25		13,608	EPA/RIT	A/B
1a. Provide above support for C activities		Need 0.25 FTE (13,608)					C
2. Provide timely mailing, filing and AREV data entry of coliform and chemical data, including LIMS data	On-going	Joan	.02		1,089	EPA/RIT	A
		Debbie	.05		2,722	FEES	
		Linda	.35		19,051	FEES	
		Chris	.35		19,051	FEES	
		temporary		3,000		FEES	
3. Enter past VOC data on AREV	9/1/93	Joan	.02		1,089	EPA/RIT	A
		Linda	.05		2,722	FEES	
		Chris	.10		10,886	FEES	
		temporary		1,200		FEES	
4. Update AREV PWS inventory	On-going	Joan	.02		1,089	EPA/RIT	A
		Debbie	.30		16,330	FEES	
		temporary		750		FEES	
↓	↓	↓	↓	↓	↓	↓	↓

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRINI WATER Fiscal Year 1993 y MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL VIII: (Continued) . . Develop and maintain data management system and provide clerical support for PWSP							
Objective 4: (Continued). . Provide other technical and clerical support							
5. General office support services	On-going	Debbie	.30		16,330	FEES	A
		Linda	.30		16,330	FEES	
		Chris	.30		16,330	FEES	
		temporary		4,990		FEES	
		Need 0.5 FTE (27,216)					C
6. Fee-related support services	On-going	Joan	.02		1,089	EPA/RIT	A
		Debbie	.35		19,051	FEES	
		Need 0.10 FTE (5,443)					C
SUBTOTAL		Need 0.85 FTE ($46,267)	2.78	9,940	156,767	$ 13,473 EPA $ 4,491 RIT $148,743 FEE	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

Program DRINK WATER Fiscal Year 1993 y MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL IX: Provide for effective formal enforcement procedures for PWSP							
Objective 1: Develop AO rules	8/31/92	Claudia, Kevin, Jim	.02	0.00	1,089	EPA/RIT	A
Objective 2: Complete AOs for unfiltered surface water supplies that must filter	5/30/93	Donna, Jim Claudia	.20	0.00	16,330	EPA/RIT	A
Objective 3: Complete AOs for unfiltered surface water systems which can avoid filtration, but which are not in complete compliance.	12/31/92	Donna, Jim, Claudia	.06	0.00	3,266	EPA/RIT	A
Objective 4: Participate in formal enforcement action.	On-going	PWSP staff Need 0.2 FTE (10,886)	.30	0.00	8,165 8,165	EPA/RIT FEES	A
TOTAL		Need 0.2 FTE ($10,886)	0.58	0	$37,015	$21,638 EPA $ 7,212 RIT $ 8,165 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week

Program DRINKING WATER Fiscal Year 1993 / MELSTAD, AUNE &JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL X: Provide effective oversight and monitoring for PWSP rules							
Objective 1: Monitor sample results, reporting and public notification for compliance with PWSP rules	On-going	PWS staff Need 2.2 FTE (108,864)	1.2*		38,102 38,102	EPA/RIT FEES	A
Objective 2: Monitor self monitoring results submitted by PWS's, do follow-up as needed.	On-going	Field services Need 0.5 FTE (27,216)	.12		6,532	FEES	A
Objective 3: Implement SWTR and provide follow-up through informal enforcement action. (Includes GWUI determinations).	On-going	Field services Need 1.5 FTE (81,648)	.50		27,216	FEES	A
Objective 4: Implement LCR and provide compliance follow-up through informal enforcement action.	On-going	Eng. Serv. Need 1.0 FTE (54,432) (FY 93)	0.25		13,608	EPA/RIT	B
Objective 5: Implement Phase II/V, incl. VAs, and provide compliance through informal enforcement action	On-going	Eng. Serv. Need 3.0 FTE (163,296) (FY 93)	.45		27,216	EPA/RIT	B
TOTAL		8.2 FTE Needed ($435,456)	2.52	0	$150,776	$59,194 EPA $19,732 RIT $71,850 FEE	

* Includes 0.3 FTE for position # 562

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

Program DRINK' WATER Fiscal Year 1993 MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
GOAL XI: Provide for staff training							
Objective 1: Provide technical training through special seminars and other training sessions	On-going	PWSP staff	0.45		12,250	EPA/RIT	B
					12,250	FEES	
Objective 2: Provide for other training through in-house efforts	On-going	PWSP staff	.40		10,886	EPA/RIT	B
					10,886	FEES	
TOTAL			0.85	0	$46,272	$17,352 EPA $ 5,784 RIT $23,136 FEES	

ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

Program DRINK WATER Fiscal Year 1993 / MELSTAD, AUNE & JENSEN

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES*				
			FTE○	CONTRACT SERVICES	TOTAL$*	FUNDING SOURCE	
GRAND TOTALS		11.05 FTE Needed	14.45	$189,940	$799,341	$369,200 $123,067 $497,014	

* Dollar amounts are approximate and may not match precisely the amounts authorized by the legislature or available funds

○ 1.00 FTE = 1880 hours = 235 work days; 0.02 FTE = 37.6 hours, or = 1 week

* Total includes cost of supporting personnel, which assumes 1.00 FTE = $54,432.(salaries, benefits, travel, communications, supplies and equipment).

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ASSUMPTIONS: .02 FTE = 40 hours = 1 week
1.00 FTE = $54,432

MONITORING, ASSESSMENT AND PLANNING PROGRAM

FISCAL YEAR 1993 PLAN

WATER QUALITY BUREAU
Department of Health and Environmental Sciences

MONITORING, ASSESSMENT AND PLANNING PROGRAM

Monitoring of the Clark Fork River and implementation of the Clark Fork River nutrient management plan will be the major elements of the Monitoring, Assessment and Planning Program in FY 1995. This year the U. S. Geological Survey will begin monitoring streamflows and metals at all stations in the upper river, allowing the DHES to dedicate limited resources to the measurement of nutrients and biological communities basinwide. The nutrient management plan, a product of the Clark Fork River/Lake Pend Oreille water quality assessment requested by Congress under Section 525 of the Clean Water Act, will be presented to the public in July at meetings in Deer Lodge, Missoula, Sandpoint, Idaho, and Newport, Washington.

The DHES will continue to fund monitoring of Flathead Lake and tributaries by the University of Montana's Biological Station (UMBS) as part of the Flathead Basin Commission's Master Plan for monitoring surface water quality in the Flathead Basin. The DHES and the UMBS will also continue Phase I Diagnostic and Feasibility Studies of Flathead and Swan Lakes under the national Clean Lakes Program.

In addition, under a statewide lake assessment grant from the EPA, the DHES and the Department of Fish, Wildlife, and Parks will begin testing fish in 20 of Montana's most popular lakes and reservoirs for residues of mercury and polychlorinated biphenyl (PCBs).

New watershed planning projects will be implemented by the DHES in the Blackfoot and Kootenai drainages using seed money provided by EPA. Water quality management planning grants will be offered to the Judith Basin, Cascade, and Teton Conservation Districts for developing watershed improvement plans for Big Otter Creek and the Teton River.

Program personnel will complete assessments on 80 waterbodies for the purpose of updating the state's 305(b) Waterbody Tracking System, and for prioritizing waters for NPS controls under the Section 319 program. Staff will complete the Ecoregion Reference Stream Study and develop biological water quality criteria and bioassessment protocols for macroinvertebrates and periphyton. Staff will also begin the first year of a two-year wetlands assessment and biocriteria project.

NPS/Wetlands and Monitoring Program personnel will continue to lend support and participate in the U. S. Department of Agriculture's River Basin Study, the Forest Service's Wilderness Lakes Assessment, the Forest Practices Cumulative Effects Cooperative (including the 1992 BMP audits), the Forestry Stewardship Program, the Flathead Basin Commission and FBC Monitoring Committee, the Upper Clark Fork River Water Planning (SB 434) Committee, the Surface Water Committee of the Clark Fork Coordinating Forum, and the Clark Fork Natural Resources Damage Assessment lawsuit.

NPS/Wetlands and Monitoring Program staff will continue to provide the following services:

- Process 3(a) authorizations, feedlot permits, and 401 certifications,
- Provide bioassessment support to other programs,
- Conduct complaint investigations,
- Provide data quality assurance support to other programs,
- Review forest management activities,
- Provide information on and interpretations of water quality conditions and water quality laws, regulations, policies and programs,
- Update the Montana/EPA Waterbody Tracking System,
- Publish the **Water Column** newsletter and
- Coordinate Total Maximum Daily Load (TMDL) activities in the WQB.

The Monitoring, Assessment and Planning Program has two additional high priority but unfunded needs. These are implementing fixed-station monitoring in the Kootenai, Missouri and Yellowstone river basins, and establishing a Lakes Protection/Volunteer Monitoring Project. These program needs would require 3.00 additional FTEs and combined state and federal funding in the amount of $536,000.

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
GOAL #1: Administer the MAP Program.							
OBJECTIVE #1: Administer the current-level MAP program.							
Activities:							
1. Plan, organize, coordinate and lead program activities, develop, defend and track budgets, prepare grant applications, prepare and monitor contracts, and perform other administrative functions.	Ongoing	Fraser Bahls Ingman	.05 .26 .10	0 0 0	$ 21,320	$6,867 205j 14,453 RIT	A
2. Fill, train and supervise program positions, assign duties, monitor and evaluate staff performance.	Ongoing	Bahls	.08	0	4,160	1,772 205j 2,388 RIT	A
3. Provide staff opportunity for professional development and training outside the work unit. (2 weeks training per position)	Ongoing	MAP Program Staff	.16 .04	0	10,400	3,544 205j 6,856 RIT	A, B
4. Provide data entry, clerical and administrative support to the MAP program.	Ongoing	Nickovich	.77	0	40,040	17,057 205j 22,983 RIT	A
5. Attend monthly section meetings; prepare monthly time sheets/activity reports.	First Monday of Each Month	MAP Program Staff	.04 .01	0	2,600	886 205j 1,714 RIT	A
6. Take annual leave.	As Scheduled	Bahls Ingman Levine Apfelbeck Nickovich	.10 .08 .06 .06 .06	0	18,720	6,203 205j 12,517 RIT	A
SUBTOTALS			1.87	0	$97,240	36,329 205j 60,911 RIT	

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
OBJECTIVE #2: Design and pursue support and funding for a statewide MAP program.							
ACTIVITIES.							
1. Develop program goals, objectives and activities.	Ongoing	Bahls	.02	0	$1,040	$ 443 205j 597 RIT	A
2. Guide/follow recommended budget modifications through the EBP process.	December	Bahls	.02	0	1,040	443 205j 597 RIT	A
3. Pursue funding from the Legislature and/or alternative sources.	Ongoing	Bahls Ingman	.02 .02	0	2,080	443 205j 1,637 RIT	A
4. Monitor reauthorization of the Clean Water Act and provide input on sections addressing monitoring, assessment, and planning.	Ongoing	Bahls	.02	0	1,040	443 205j 597 RIT	B
SUBTOTALS			0.10	0	$5,200	1,772 205j 3,428 RIT	
GOAL #2: Monitor water quality conditions and trends and assess sources and causes of pollution.							
OBJECTIVE #1 Implement fixed-station monitoring in the Kootenai, Missouri, and Yellowstone river basins.		2.00 FTE Needed	0	0	0	___	C
OBJECTIVE #2 Continue the Clark Fork River Basin Water Quality Monitoring Project.							
ACTIVITIES:							
1. Conduct synoptic sampling for water quality 15 times per year at 26 stations, and for macroinvertebrates and periphyton once in August.	Once each month, every two weeks during runoff	Apfelbeck Ingman Levine	.24 .12 .08	0	$22,880	7,088 205j 15,792 RIT	A

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1994 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
2. Process water chemistry and biological samples; interpret biological data and prepare reports.	Ongoing	Chemistry Lab Contractors	0	57,348	57,348	$52,348 RIT 5,000 525	A
3. Perform water quality assessments and trend analyses on chemical data and prepare report.	June	Ingman	.12	0	6,240	RIT	A
SUBTOTALS			0.56	$57,348	$86,468	7,089 205j 74,379 RIT 5,000 525	
OBJECTIVE #3: Conduct waterbody surveys for the purpose of updating the Waterbody System and prioritizing waters for NPS pollution controls.							
ACTIVITIES:							
1. Conduct surveys on 80 waterbodies following approved survey plan and standard assessment protocols.	Ongoing	Levine Tralles Apfelbeck	.24 .24 .17	0	$33,800	9,082 205j 12,480 319 12,238 RIT	A
2. Process and interpret water chemistry and biological samples collected from surveyed waterbodies.	Ongoing	Levine Chemistry Lab Contractor	.04	$10,000	12,080	5,146 205j 6,934 RIT	A
3. Prepare and enter assessments for these waterbodies into the Waterbody System and the Stream Reach Tracking System; summarize and report results.	Ongoing	Levine Tralles	.04 .06	0	5,200	886 205j 1,194 RIT 3,120 319	A
SUBTOTALS			0.79	$10,000	$51,080	15,114 205j 20,366 RIT 15,600 319	

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
OBJECTIVE #4: Implement a lakes monitoring, assessment and planning program for Montana.							
ACTIVITIES:							
1. Monitor Flathead Lake and tributaries (7 stations 15 times per year) per agreement.	Ongoing	Flathead Lake Biological Station (FLBS)	0	$30,000	$30,000	106	A
2. Complete Year #2 of the two-year Flathead Lake diagnostic and feasibility study per approved workplan.	June	FLBS	0	50,000	50,000	$35,000 314 15,000 UM Match	B
3. Continue Swan Lake diagnostic and feasibility study per approved workplan.	Ongoing	FLBS	0	68,571	68,571	48,000 314 20,571 UM Match	B
4. Continue lake water quality assessment (mercury in fish) project per approved workplan.	Ongoing	Bahls DFWP MSU Ag. Lab	.04	47,920	50,000	$886 205j 1,194 RIT 22,920 DFWP Match 25,000 314	B
5. Serve on Flathead Basin Commission and FBC Monitoring Committee, attend annual EPA Lakes Management and NALMS conferences, administer Clean Lakes grants and contracts, and pursue additional support and funding for a Clean Lakes/Volunteer Monitoring Program.	Ongoing	Bahls	.12	0	6,240	2,658 205j 3,582 RIT	B
6. Implement a statewide lakes protection/volunteer monitoring project.		1.00 FTE Needed	0	0	0	——	C

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
SUBTOTALS		1.00 FTE Needed	0.16	$196,491	$204,811	$3,544 205j 4,776 RIT 30,000 106 108,000 314 35,571 UM Match 22,920 DFWP Match	
OBJECTIVE #5: Begin first year of two-year wetlands assessment and biocriteria project.							
ACTIVITIES:							
1. Collect and analyze water quality and biological samples from 40 least-impaired wetlands in Montana.	December	Apfelbeck Chemistry Lab Contractors	.24	$32,000	$44,480	5,316 205j 7,164 RIT 32,000 104b	B
2. Compile and tabulate data; prepare progress reports.	June	Apfelbeck	.08	0	4,160	1,772 205j 2,388 RIT	B
3. Develop preliminary water quality and biological criteria and bioassessment protocols for Montana wetlands.	June	Bahls Contractor	.04	8,000	10,800	886 205j 1,194 RIT 8,000 104b	B
4. Administer wetlands project.	Ongoing	Bahls	.04	0	2,080	886 205j 1,194 RIT	B
SUBTOTALS			0.40	$40,000	$60,800	8,860 205j 11,940 RIT 40,000 104b	

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
OBJECTIVE #6: Maintain and update Waterbody System in preparation for the 1994 305(b) Report.							
ACTIVITIES:							
1. Assemble and evaluate available water quality information, prepare or revise waterbody assessments as necessary, and enter assessments into Waterbody System.	Ongoing	Levine	.24	0	$12,480	$5,316 205j 7,164 RIT	A
2. Support and update the Waterbody System and Stream Reach Tracking System as needed.	Ongoing	Harbaugh	[5]	0	[5]		A
SUBTOTALS			0.24	0	12,480	5,316 205j 7,164 RIT	
GOAL #3: Prepare and review plans to protect high quality waters and to correct existing water quality problems.							
ACTIVITIES:							
OBJECTIVE #1: Complete Montana portion of the Section 525 Clark Fork River/ Lake Pend Oreille Nutrient Management Plan, and implement the plan.							
1. Complete technical and public review of the plan and develop final draft.	September	Ingman	.12	0	$6,240	RIT	A
2. Pursue support and funding for plan implementation and monitoring.	Ongoing	Ingman	.02	0	1,040	RIT	A
3. Guide implementation and monitoring of the plan given available resources.	Ongoing	Ingman	.12	0	6,240	RIT	A
4. Continue development of Clark Fork Basin GIS; pursue support and funding for application.	Ongoing	Ingman State Library	.02	$12,000	13,040	1,040 RIT 12,000 525	A
SUBTOTALS			0.28	12,000	$26,560	$14,560 RIT 12,000 525	

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Rahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
OBJECTIVE #2: Coordinate new watershed planning projects per April 17 proposal to EPA.							
ACTIVITIES:							
1. Blackfoot Project.	Ongoing	Ingman	.06	$20,000	23,120	$ 3,120 RIT 20,000 EPA Watershed	A
2. Kootenai Project.	Ongoing	Ingman	.06	10,000	13,120	3,120 RIT 10,000 EPA Watershed	A
SUBTOTALS			0.12	$30,000	$36,240	6,240 RIT 30,000 EPA Watershed	
OBJECTIVE #3: Review the Freezeout Lake discharge water management plan and review as necessary.	April	Ingman Apfelbeck	.02 .02	0	2,080	443 205j 1,637 RIT	B
SUBTOTALS			0.04	0	$2,080	443 205j 1,637 RIT	
GOAL #4: Provide water quality information and other assistance to resource managers and the public to increase awareness of water quality issues and problems and to prevent and control degradation of aquatic ecosystems.							
OBJECTIVE #1: Provide copies of the latest 305 (b) Report, waterbody assessments, water quality data and other information on request.	Ongoing	Levine State Library[6]	.05	0	$2,600	1,108 205j 1,492 RIT	A

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[1]	FUNDING SOURCE(S)	
OBJECTIVE #2: Complete the Ecoregion Reference Stream Study and develop biological water quality criteria and bioassessment protocols.							
ACTIVITIES:							
1. Prepare report on data collected in 1991 to define inter-reach, inter-riffle and year-to-year variation in biological metrics.	December	Bukantis Bahls	.04 .04	0	$4,160	$2,080 319 886 205j 1,194 RIT	A
2. Develop bioassessment techniques and biological criteria for periphyton, fish and benthos.	June	Bukantis Bahls	.06 .06	0	6,240	3,120 319 1,329 205j 1,791 RIT	A
3. Establish pollution tolerance of common periphyton taxa using the Biological Data System (BIOD) and published literature.	June	Bahls Harbaugh	.04 [5]	0	2,080 [5]	886 205j 1,194 RIT	B
SUBTOTALS		0	0.24	0	12,480	5,200 319 3,101 205j 4,179 RIT	
OBJECTIVE #3: Follow up on highest priority complaints in a timely manner; provide technical assistance on complaints.	Ongoing	Levine Apfelbeck	.04 .04	0	$4,160	1,772 205j 2,388 RIT	A
SUBTOTALS			0.08	0	$4,160	1,772 205j 2,388 RIT	
OBJECTIVE #4: Assist with Clark Fork NRDA suit, participate in the Surface Water Subcommittee of the Clark Fork Coordinating Forum, and on the SB 434 Planning Committee.	Ongoing	Ingman	.09	0	$4,680	RIT	A
OBJECTIVE #5: Provide QA/QC services to water quality management programs and projects and coordinate EMIH activities.	Ongoing	Levine	.08	0	$4,160	$1,772 205j 2,388 RIT	A

Program Monitoring, Assessment, and Planning (MAP) Fiscal Year 1993 By Loren Bahls

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
TOTALS		3.00 FTE Needed[7]	5.10[8]	$322,919	$611,039	86,222	205j
						220,526	RIT[9]
						17,000	525
						20,800	319
						108,000	314
						30,000	106
						40,000	104b
						30,000	EPA Watershed
						35,571	UM Match
						22,920	DFWP Match

[1]Dollar amounts in this planning matrix are approximate and may not match precisely the amounts authorized by the legislature or available funds.

[2]1.00 FTE = 249 work days = 1992 work hours; 0.02 FTE = 39.8 hours or about 1 week.

[3]Total includes cost of supporting personnel, which assumes 1.00 FTE = $52,000 (includes salaries and benefits, indirect, travel,supplies, communications, and equipment)

[4]Priorities are defined as follows:
A. Absolutely essential to accomplish within the time indicated in order to accomplish mission.
B. Important, but not essential to mission; could be delayed if necessary.
C. High priority objectives or activities for which resources are currently unavailable; same as A priorities except they are unfunded.

[5]Services provided by the Technical Studies and Support Section and funded by the Nonpoint Source Program (not reflected in RESOURCES column).

[6]Requests for retreival of data from the Mainframe Computer will be referred to the State Library.

[7]Total funding required to support additional (Priority C) program activities, including these FTEs, would amount to $536,000.

[8]An additional 0.5FTE (Pos. No. 503-Reid) is supported by the MAP Program but assigned to the Water Pollution Ctrl. Program in the Technical Studies and Support Section.

[9]Hazardous Waste CERCLA Account.

NONPOINT SOURCE POLLUTION CONTROL PROGRAM

FISCAL YEAR 1993 PLAN

WATER QUALITY BUREAU
Department of Health and Environmental Sciences

NONPOINT SOURCE POLLUTION CONTROL PROGRAM

Emphasis will continue in FY 1993 on control of nonpoint sources (NPS of pollution, which account for over 90 percent of the documented water quality problems in Montana. Section 319 of the Federal Clean Water Act establishes a national program for controlling nonpoint source pollution and a system to share the state and local costs of implementing controls. To be eligible to the EPA in 1988, a Nonpoint Source Assessment Report and a Nonpoint Source Management Program. The management program was updated in 1991.

Montana gained full approval of its Nonpoint Source Assessment Report and Management Program. The Montana Management Program is intended to be a coordinated, comprehensive, multi-agency approach to NPS control with the DHES as the lead agency. The goal is to achieve, through education, financial incentives, and other means, universal application of best management practices (BMPs) for those source categories that substantially impair or threaten to impair beneficial uses of Montana waters. The significant source categories for Montana are agriculture, forest practices, and resource extraction.

In FY 1993, the state will continue to implement its fully approved Nonpoint Source Management Program, target additional waterbodies for implementation, set milestones for controls and pursue nonfederal sources of funding to meet the 40 percent nonfederal match requirement. The state received about $1,347,000 in grants from the EPA to begin implementing its fully approved Management Program in FY 1991 and 1992. Approximately $642,000 will be available in FY 1993.

WETLANDS PROTECTION PROGRAM

DHES has also assumed the lead in the development of an interagency, statewide wetlands protection strategy, including the monitoring of selected wetlands throughout the state and the development of wetland water quality standards. The state will receive $433,360 in FY 1993 to implement the strategy with much of the funds will be contracted to other state agencies for wetland education programs, wetland delineation and training, investigation of wetland impacts by highways and possible mitigation opportunities, development of wetland data base and coordination of the agencies' wetland programs.

Unfunded priorities submitted under the Executive Planning Process (EPP) include an additional .5 Full Time Equivalent (FTE) in the NPS Program to develop and implement an expanded program as required by the Clean Water Act, and an additional .5 FTE to implement the state wetlands protection strategy. The additional .5 FTE in each program will be combined with existing FTEs for needed full-time positions.

Program - Nonpoint Source/Wetlands | Fiscal Year 1993 | By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
GOAL #1: Administer The NPS Pollution Control And Wetlands Program							
OBJECTIVE #1: Administer The Current Level Programs							
ACTIVITIES							
1. Finalize the FFY 1992 workplan and budget for Section 319 funds and submit to EPA.	July	Thomas	.02	0	$1,080	$875 106 205 RIT	A
2. Prepare workplan and budget for FFY 1993 Section 319 funds and 104(B)(3) Wetlands funds and submit to EPA.	October-March	Thomas	.06		$3,240	$2,624 106 616 RIT	A
3. Plan, organize, coordinate, and lead program activities, prepare grant applications, prepare and monitor contracts, lobby and provide information to legislature, and perform other administrative functions.	July-June	Fraser Thomas Bahls	.05 .18 .05		$15,180	$4,947 RIT 7,873 106 2,300 205j	A
4. Fill, train and supervise program positions, assign duties, monitor and evaluate staff performance.	July-June	Thomas	.04		$2,160	$1,750 106 410 RIT	A
5. Provide staff opportunity for professional development and training outside the work unit.	July-June	Program Staff	.16		$8,640	$8,640 319	A/B
6. Provide clerical and administrative assistance to the NPS and Wetlands programs.	July-June	Nickovich	.04		$4,320	$2,480 RIT 1,840 205j	A
7. Attend monthly section meetings; prepare monthly reports.	July-June	Program Staff	.05		$2,160	$2,160 319	A
8. Take annual leave.	As scheduled	Thomas Tralles Bukantis Lyon Kellogg New Position	.06 .06 .06 .06 .06 .06		$19,440	$2,624 106 616 RIT 14,580 319 1,620 SCS	A

Program - Nonpoint Source/Wetlands

Fiscal Year 1993

By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
SUBTOTALS			1.04	0	$56,160	$15,746 106 9,274 RIT 25,380 319 4,140 205j 1,620 SCS	
OBJECTIVE #2: Design And Pursue Support And Funding For Expanded NPS And Wetlands Program.							
ACTIVITIES							
1. Develop program goals, objectives and activities.	Ongoing	Thomas	.04		$2,160	$1,750 106 410 RIT	A
2. Present recommendations for an expanded program to the NPS Task Force and provide support to Task Force.	Ongoing	Thomas	.02		$1,080	$875 106 205 RIT	A
3. Investigate and pursue alternative sources of funding for an expanded program, develop budgets and funding requests.	July-June	Thomas	.04		$2,160	$1,750 106 410 RIT	A
4. Monitor reauthorization of the Clean Water Act and provide input on section addressing NPS control and Wetlands.	July-June	Thomas	.02		$1,080	$875 106 205 RIT	B
SUBTOTALS			.12		$6,480	$5,250 106 1,230 RIT	
GOAL #2: Reduce The Impairment Of State Waters By NPS Pollution.							
OBJECTIVE #1: Implement Watershed Projects To Demonstrate The Use Of Best Management Practices							
ACTIVITIES							

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
1. Work with conservation districts, USDA and other project sponsors to plan and implement NPS Watershed Projects.	July-June	Thomas Kellogg Bukantis Conservation Districts (CDs)	.06 .56 .02 0	$1,028,410	$1,062,970	$2,624 106 15,120 SCS 971,300 319 616 RIT 73,310 RDGP	A
2. Provide grant funds to project sponsors through contractual agreements; monitor agreements; review reports; process payments.	July-June	Thomas Bukantis Lyon New position	.06 .04 .14 .20		$23,760	$2,624 106 20,520 319 616 RIT	A
3. Select future NPS watershed projects from priority list of impaired streams as ranked by interagency committee.	July-June	Thomas Kellogg NPS TASK FORCE	.02 .04		$3,240	$875 106 1,080 319 205 RIT 1,080 SCS	A
SUBTOTALS			1.14	$1,028,410	$1,089,970	$6,123 106 992,900 319 16,200 SCS 1,437 RIT 73,310 RDGP	
OBJECTIVE #2: Implement A Proactive NPS Education Program.							
ACTIVITIES							
1. Assist watershed and education project sponsors in the development and implementation of their education programs, execute contractual agreements; monitor contracts.	July-June	Lyon Thomas CDs/Others	.14 .02 0	$166,444	$175,084	$174,004 319 875 106 205 RIT	A
2. Continue development and implementation of agricultural education campaign and other NPS education activities..	July-June	Lyon	.30		$16,200	$16,200 319	A

Program - Nonpoint Source/Wetlands

Fiscal Year 1993

By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
3. Participate in planning and execution of regional water quality conferences.	July-March	Kellogg Lyon Thomas	.06 .02 .02		$5,400	$205 RIT 2,700 319 1,620 SCS 875 106	A
4. Participate in Mining Education Advisory Committee; assist in the development of educational materials; contact for educational material development.	July-June	Lyon Thomas	.04 .02		$3,240	$2,160 319 875 106 205 RIT	A/B
5. Provide NPS education and technical assistance to educators.	September-May	Lyon	.06		$3,240	$3,240 319	A/B
6. Prepare and distribute quarterly newsletter, The Water Column	August November February May	Lyon	.16		$8,640	$8,640 319	A
SUBTOTALS			.84	$166,444	$211,804	$206,944 319 2,625 106 615 RIT 1,620 SCS	
OBJECTIVE #3: Develop And Implement NPS Monitoring Workplans To Document Water Quality Improvement.							
ACTIVITIES							
1. Design, implement, coordinate and assist project sponsors with monitoring existing and planned NPS Watershed projects.	July-June	Bukantis Apfelback Levine	.60 .10 .08		$42,120	$32,400 319 5,580 RIT 4,140 205j	A
2. Establish and maintain a computerized system to manage NPS project data and enter data as it becomes available.	July-June	Bukantis Nickovich	.06 .04		$5,400	$3,240 319 1,240 RIT 9,200 205j	A

Program - Nonpoint Source/Wetlands

Fiscal Year 1993

By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
SUBTOTALS			.88		$47,520	$35,640 319 6,820 RIT 5,060 205j	
OBJECTIVE #4: Establish, Maintain And Operate Water Quality Data Base.							
ACTIVITIES							
1. Maintain, operate and update the Waterbody System (WBS).	July-June	Harbaugh[5]	0			319	
2. Maintain, operate and update the Biological Data System (BIOD).	July-June	Harbaugh[5]	0			319	
3. Maintain, operate and update the NPS stream Reach Tracking System (RTS).	July-June	Harbaugh[5]	0			319	
4. Assist with the management, maintenance and daily operation of the Local Area Network (LAN).	July-June	Harbaugh[5]	0			319	
SUBTOTALS						319	
OBJECTIVE #5: Continue Stream Reach Assessment.							
ACTIVITIES							
1. Produce a final stream reach assessment format.	July	Tralles	.04		$2,160	$2,160 319	A
2. Prepare a priority list of impaired streams for NPS watershed projects using stream reach and waterbody assessments.	October-December	Tralles Kellogg	.02 .04		$3,240	$2,160 319 1,080 SCS	A
SUBTOTALS			.10		$5,400	$4,320 319 1,080 SCS	

Program - Nonpoint Source/Wetlands

Fiscal Year 1993

By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
OBJECTIVE #6: Carry Out Regulatory NPS Pollution Control Activities And Coordinate With Other Regulatory Agencies.							
ACTIVITIES							
1. Issue 3As, 401 certification and feedlot permits.	July-June	Thomas	.16		$8,640	$6,998 106 1,642 RIT	A
2. Follow-up on highest priority complaints in a timely manner.	July-June	Thomas Tralles Bukantis New Position	.02 .04 .04 .04		$7,560	$875 106 6,480 319 205 RIT	A/B
SUBTOTAL			.30		$16,200	$7,873 106 1,847 RIT 6,480 319	
OBJECTIVE #7: Coordinate NPS Program Activities With Water Quality Programs Administered By Other State And Federal Agencies And CDs.							
ACTIVITIES							
1. Review the program activities of federal agencies to ensure the federal consistency provisions of Section 319 are met.	July-June	Thomas Kellogg Tralles	.02 .04 .06		$6,480	$205 RIT 875 106 4,320 319 1,080 SCS	A
2. Meet with NPS Task Force to present annual program workplans, discuss program objectives, and prioritize projects.	September December March June	Thomas Kellogg Bukantis Lyon Tralles New Position	.02 .02 .02 .02 .02 .02		$6,480	$875 106 205 RIT 5,400 319	A
3. Coordinate NPS program with DHES Groundwater program and Dept. of Agriculture to assist in the development and implementation of a statewide Agricultural Chemical Groundwater Management Plan.	July-June	Thomas Lyon	.02 .02		$2,160	$875 106 1,080 319 205 RIT	A/B

Program - Nonpoint Source/Wetlands Fiscal Year 1993 By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[3]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
4. Coordinate NPS program activities with USDA agencies to ensure USDA water quality initiative activities are consistent with NPS program; cooperate on Hydrologic Unit Area, Demonstration Area, and Special Water Quality Projects.	July-June	Thomas Kellogg	.04 .14		$9,720	$1,750 106 3,780 319 410 RIT 3,780 SCS	A
SUBTOTAL			.46		$24,840	$1,025 RIT 4,375 106 14,580 319 4,860 SCS	
OBJECTIVE #8: Provide Oversight Of Resource Management Programs And Activities Pursuant To Existing MOUs.							
ACTIVITIES							
1. Review and comment of forest plans, timber sales, grazing allotments, and EISs prepared on these and other activities.	July-June	Tralles Bukantis Thomas	.24 .02 .02		$15,120	$205 RIT 14,040 319 875 106	A
2. Participate in Watershed Cummulative Effects Cooperative and BMP audit teams.	July-June	Tralles	.08		$4,320	$4,320 319	A/B
3. Participate in Forestry Stewardship program.	July-June	Tralles	.06		$3,240	$3,240 319	A/B
4. Assist in the development and review of rules adopted under 11B 731 pertaining to streamside management zones.	July-December	Tralles	.02		$1,080	$1,808 319	B
5. Review and revise as necessary MOUs with resource agencies.	July-June	Tralles	.02		$1,080	$1,080 319	B
SUBTOTAL							

Program - Nonpoint Source/Wetlands Fiscal Year 1993 By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
OBJECTIVE #9: Develop New Source Category Programs For Resource Extraction, Hydromodification And Construction.							
ACTIVITIES							
1. Develop new source category programs for resource extraction, hydromodification and construction.	July-June	New position	.14	.	$7,560	$7,560 319	A
2. Begin implementation.	July-June	New position	.04		$2,160	$2,160 319	A
3. Fully implement expanded NPS program.	December-June	.5 FTE Needed	0	0	0	0	C
GOAL #3: Administer The State Wetlands Protection Program.							
OBJECTIVE #1: Lead The Development And Implementation Of A Statewide, Interagency Wetlands Protection Strategy.							
ACTIVITIES							
1. Compile existing wetland information from all resource agencies; begin development of database to store and retrieve information.	August-June	New Position	.12		$6,480	$6,480 104(B)(3)	A
2. Develop state wetlands protection strategy to coordinate the activities of all resource agencies.	August-June	New Position	.20		$10,800	$10,800 104(B)(3)	A
3. Develop and execute an interagency MOU for wetlands management and protection.	January-June	New Position	.04		$2,160	$2,160 104(B)(3)	A/B
4. Contract with other agencies to carry out approved wetlands components; monitor contracts.	August-June	New Position	.06	$372,610	$375,850	$375,850 104(B)(3)	A
5. Establish Interagency Wetlands Council; provide support.	August-June	New Position Thomas	.04 .02		$3,240	$2,160 104(B)(3) 875 106 205 RIT	A/B

Program - Nonpoint Source/Wetlands Fiscal Year 1993 By Jack Thomas

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES[1]				PRIORITY[4]
			FTE[2]	CONTRACTED SERVICES	TOTAL $[3]	FUNDING SOURCE(S)	
6. Implement wetlands strategy.	December-June	.5 FTE Needed	0	0	0	0	C
SUBTOTALS			.48	$372,610	$398,530	$397,450 104(B)(3) 875 106 205 RIT	
TOTALS		1.0 FTE[6] Needed	6.0	1,567,464	$1,891,464	$1,319,724 319 22,658 RIT 43,742 106 25,380 SCS 397,450 73,310 RDGP 9,200 205j	104(B)(3)

[1]Dollar amounts in this planning matrix are approximate and may not match precisely the amounts authorized by the legislature or available funds.

[2]1.00 FTE = 249 work days = 1992 work hours; 0.02 FTE = 39.8 hours or about 1 week.

[3]Total includes cost of supporting personnel, which assumes 1.00 FTE = $54,000 (includes salaries and benefits, indirect, travel, supplies, communications, and equipment).

[4]Priorities are defined as follows:
A. Absolutely essential to accomplish within the time indicated in order to accomplish mission.
B. Important, but not essential to mission; could be delayed if necessary.
C. High priority objectives or activities for which resources are currently unavailable; same as A priorities except they are unfunded.

[5]Services provided by the Technical Studies and Support Section and funded by the Nonpoint Source Program (not reflected in RESOURCES column).

[6]Total funding required to support additional (Priority C) program activities, including these FTEs, would amount to $54,000.

TECHNICAL STUDIES AND SUPPORT PROGRAM

FISCAL YEAR 1993

WATER QUALITY BUREAU
DEPARTMENT OF HEALTH AND ENVIRONMENTAL SCIENCES

TECHNICAL STUDIES AND SUPPORT SECTION

The missions of the Technical Studies and Support Section are to protect, maintain, and improve the quality of State waters for all beneficial uses.

This section provides scientific support to the Bureau in the area of standards development and interpretation, including the development of permit limits, provides technical support for computer and data management systems for all Bureau sections, and provides technical support for reviewing and tracking developments (such as mining) which may effect surface or ground water quality whether or not the development activity requires a permit from the Department of Health and Environmental Sciences (DHES). The section needs a full time administrative assistant in order to keep up with the paper work.

The section provides scientific analysis concerning toxicity, permit limits, standards interpretations, determination of nondegradation standards, and the implementation of nondegradation standards.

The State surface water quality standards and the nondegradation rules must be reviewed and revised at intervals not to exceed three years. In fact, the review and revision process requires a constant level of effort with concentrated effort every three years. The nondegradation rules were adopted in 1982 and are increasingly being utilized as public awareness grows. These rules require extensive revisions to be truly meaningful and usable. All of these factors have resulted in a significant increase in support effort; as for the future, major effort will be required to stay even with demands.

At the present time hard-rock mines are the most visible and contentious developments which could potentially degrade water quality throughout the State of Montana. The Technical Studies and Support Section is responsible for ensuring these hard-rock mining activities are in compliance with the water quality standards of Montana. To this end one person from the section serves as a liaison with the Hardrock Bureau of the Department of State Lands. The section reviews all mining plans submitted for potential violations of the water quality standards. Follow-up includes inspections and monitoring, after construction,to ensure compliance with nondegradation requirements surface and ground water quality standards. At the present time these developments are not processed in a timely manner and there is virtually no follow up in terms of monitoring and review. Three full time 3 FTE's would be

necessary to fulfil our responsibilities in this area.

Additionally, through the Montana Environmental Policy Act (MEPA) process, all other significant developments, such as sub-divisions or shopping malls, which may affect water quality, are reviewed by section personnel for potential impacts and compliance requirements.

The section provides personal computer and local area network (LAN) hardware and software support to the Water Quality Bureau staff. This support includes administration of the Bureau's Local Area Network (LAN). The LAN technical support includes:

- research for hardware and software development,
- planning and developing Bureau computer system,
- ordering equipment,
- inventory control of all computer system hardware and software to meet the requirements of the Bureau, Department, and State requirements for inventory control.
- the section personnel also assist in the maintenance, troubleshooting, repair, and upgrading of the Bureau's computer system hardware and software,
- and provide computer expertise to the Bureau staff.

The section also provides operational and software support to the Water Quality Bureau staff and intra-Department groups for the State's mainframe computer system and the EPA's National Computer Center (NCC) programs (FRDS and STORET) and systems. Over all 1 FTE is needed to adequately support the general computer needs of the bureau.

In addition to the previously mentioned general computer support the section also provides specific computer based data systems for the Ecosystem Management Section which includes:

- retrieval of information from the WATERBODY SYSTEM in the format required by the latest 305b guidance;
- establishing and maintaining a computerized system to manage NPS demonstration project monitoring data and entering data as it becomes available;
- and maintaining, operating, and updating the Waterbody System (WBS);
- the Biological Data System (BIOD);
- and the NPS stream Reach Tracking System (RTS).

The section also provides specific data management support for the Drinking Water Section. This support includes:

- developing software to track the many new requirements in the drinking water program and updating the current system;

- developing a long-range data management plan to include electronic databases, paper records management, hardware, software, staffing projections, and connecting to other WQB databases. This activity needs about 0.5 FTE in order to automate the drinking water files in a timely manner.

The section provides coordination and technical research in support of State/Environmental Protection Agency Data Management (SEDM) projects and activities, and conducts research for the Bureau on future changes and upgrades to computer systems and general technology for such topics as Global Posititioning Systems (GPS) and Geographic Information Systems (GIS).

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
OBJECTIVE #1: ADMINISTER THE WATER QUALITY BUREAU.							
Activities required for the accomplishment of Objective #1:							
A. Administer the Water Quality Bureau;	Ongoing	Dan F	0.40		17,824	EPA-106	A
					4,208	STATE-HWC	
B. Administrative support for Water Quality Bureau including purchase requisitions, time-keeping, scheduling meetings and travel, phone answering services, and records. Supervision of support secretarial staff.	Ongoing	Marl G	1.00		44,560	EPA-106	A
					10,520	STATE-HWC	
EPA/106 FUNDING SUBTOTAL:			**1.133**		**62,384**		
STATE/HWC FUNDING SUBTOTAL:			**0.267**		**14,728**		
SUBTOTAL FOR OBJECTIVE #1:			**1.400**		**77,112**		
OBJECTIVE #2: ADMINISTER THE TECHNICAL STUDIES AND SUPPORT GROUP.							
Activities required for the accomplishment of Objective #2:							
A. Plan section activities, develop budgets, and write reports;	Ongoing	Abe H	0.20		8,912	EPA-106	A
					2,104	STATE-HWC	
B. Assign duties, supervise, and evaluate staff;	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
C. Conduct research, prepare and submit requests for EPA grants; prepare budget amendments;	Ongoing	Abe H	0.10		4,456	EPA-106	A
					1,052	STATE-HWC	
	Ongoing	Don M	0.02		891	EPA-106	B
					210	STATE-HWC	
D. Conduct research, prepare and submit special computer system projects concerning outside vendors;	Ongoing	Don M	0.16		7,130	EPA-106	A
					1,683	STATE-HWC	
E. Preparation of Montana's Fee Bill;	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Don M	0.12		5,347	EPA-106	A
					1,262	STATE-HWC	
F. Inter-agency/Department contract development. Development of external, private vendor contracts. Supervision of vendor contracts.	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Don M	0.17		7,575	EPA-106	B
					1,788	STATE-HWC	
G. Administrative assistant, duties-as-required.		1.0 FTE NEEDED				NEEDED	C

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
EPA/106 FUNDING SUBTOTAL:			0.769		42,333		
STATE/HWC FUNDING SUBTOTAL:			0.181		9,992		
SUBTOTAL FOR OBJECTIVE #2:			0.950		52,325		
ADDITIONAL FUNDING REQUIRED FOR OBJECTIVE #2:		55,080 (1 FTE)					
OBJECTIVE #3: PROVIDE TECHNICAL SUPPORT IN THE AREAS OF TOXICITY, STANDARDS INTERPRETATION, PERMIT LIMITS, AND EVALUATION OF THE ENVIRONMENTAL EFFECTS OF ACTIVITIES REGULATED BY STATE LAW.							
Activities required to accomplish Objective #3:							
A. Consult with staff, other agencies and the public on questions of toxicity, non-degradation, water quality standards, and permit limits;	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Tom R	0.16		4,406	DSL	A
					2,379	STATE-RIT	
					2,027	EPA/205J	
B. Review EA's and EIS's from DSL, DNRC, US Forest Service, etc..	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Tom R	0.28		7,711	DSL	A
					4,164	STATE-RIT	
					3,547	EPA/205J	

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
EPA/106 FUNDING SUBTOTAL:			**0.097**		**5,348**		
STATE/HWC FUNDING SUBTOTAL:			**0.023**		**1,262**		
DEPARTMENT OF STATE LANDS (DSL) FUNDING SUBTOTAL:			**0.220**		**12,117**		
STATE RIT FUNDING SUBTOTAL:			**0.119**		**6,543**		
EPA/205J FUNDING SUBTOTAL:			**0.101**		**5,574**		
SUBTOTAL FOR OBJECTIVE #3:			**0.463**		**25,496**		
OBJECTIVE #4: PROVIDE INPUT TO THE DEPARTMENT OF STATE LANDS (DSL) ON THE WATER QUALITY EFFECTS OF PROPOSED MINING ACTIVITIES AND DETERMINE THE EFFECTS OF ONGOING MINING ACTIVITIES.							
Activities required for the accomplishment of Objective #4:							
A. Review operating plans of all hard rock mines upon submittal to DSL for potential violations of water quality statutes;	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Tom R	0.13		3,580	DSL	A
					1,933	STATE-RIT	
					1,647	EPA/205J	
		1.0 FTE NEEDED				Needed	C
B. Assist DSL and the Forest Service in the development of EA's and EIS's for mining and milling projects;	Ongoing	Abe H	0.06		2,674	EPA-106	A

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
					631	STATE-HWC	
	Ongoing	Tom R	0.13		3,580	DSL	A
					1,933	STATE-RIT	
					1,647	EPA/205J	
		1.0 FTE NEEDED				Needed	C
C. Monitor and inspect mines and mills to ensure compliance with water quality statutes;	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Tom R	0.13		3,580	DSL	A
					1,933	STATE-RIT	
					1,647	EPA/205J	
		0.50 FTE NEEDED				Needed	C
D. Follow through on non-degradation decisions and petitions.	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Tom R	0.13		3,580	DSL	A
					1,933	STATE-RIT	
					1,647	EPA/205J	
		0.50 FTE NEEDED				Needed	C

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
EPA/106 FUNDING SUBTOTAL:			0.194		10,696		
STATE/HWC FUNDING SUBTOTAL:			0.046		2,524		
DEPARTMENT OF STATE LANDS (DSL) FUNDING SUBTOTAL:			0.260		14,320		
STATE RIT FUNDING SUBTOTAL:			0.140		7,732		
EPA/205J FUNDING SUBTOTAL:			0.120		6,588		
SUBTOTAL FOR OBJECTIVE #4:			0.760		41,860		
ADDITIONAL FUNDING REQUIRED FOR OBJECTIVE #4:		165,240 (3 FTE)					
OBJECTIVE #5: KEEP THE SURFACE WATER AND NON-DEGRADATION RULES IN COMPLIANCE WITH STATE AND FEDERAL REQUIREMENTS.							
Activities required to accomplish Objective #5:							
A. Review the rules and make necessary changes at intervals not-to-exceed three years;	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Don M	0.22		9,803	EPA-106	A
					2,314	STATE-HWC	
EPA/106 FUNDING SUBTOTAL:			0.227		12,477		
STATE/HWC FUNDING SUBTOTAL:			0.054		2,945		

Planni Matrix

Technical Studies and Support Program | **Fiscal Year 1993** | **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
SUBTOTAL FOR OBJECTIVE #5:			**0.280**		**15,422**		
OBJECTIVE #6: PROVIDE PERSONAL COMPUTER & LOCAL-AREA-NETWORK (LAN) SUPPORT TO THE BUREAU STAFF.							
Activities required to accomplish Objective #6:							
A. Administer the Bureau LAN until transition to the Department LAN takes place;	Ongoing	Don M	0.02		891	EPA-106	A
					210	STATE-HWC	
	Ongoing	Pam D	0.06		3,264	EPA/PWSS	A
B. Supplement LAN support in the areas not supported by the Department;	Ongoing	Don M	0.02		891	EPA-106	A
					210	STATE-HWC	
	Ongoing	Alan H	0.12		6,480	EPA/NPS	A
	Ongoing	Pam D	0.06		3,264	EPA/PWSS	A
		0.20 FTE NEEDED				NEEDED	C
C. Provide computer expertise to staff;	Ongoing	Don M	0.02		891	EPA-106	A
					210	STATE-HWC	
	Ongoing	Alan H	0.06		3,240	EPA/NPS	A
	Ongoing	Pam D	0.04		2,176	EPA/PWSS	A
		0.20 FTE NEEDED				NEEDED	C

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
D. Develop personal computer programs to support Bureau responsibilities; includes specification development for contracted services;	Ongoing	Don M	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Pam D	0.02		1,088	EPA/PWSS	A
	Ongoing	Alan H	0.04		2,160	EPA/NPS	A
	Ongoing			1000	809	EPA-106	A
					191	STATE-HWC	
		0.25 FTE NEEDED				NEEDED	C
E. LAN Managers meetings and planning sessions.	Ongoing	Don M	0.01		446	EPA-106	A
					105	STATE-HWC	
	Ongoing	Pam D	0.04		2,176	EPA/PWSS	A
	Ongoing	Alan H	0.03		1,620	EPA/NPS	A
		0.03 FTE NEEDED				NEEDED	C
EPA/106 FUNDING SUBTOTAL:			0.105		5,793		
STATE/HWC FUNDING SUBTOTAL:			0.025		1,366		
EPA/PWSS FUNDING SUBTOTAL:			0.220		11,968		
EPA/NPS FUNDING SUBTOTAL:			0.250		13,500		

Planni Matrix

Technical Studies and Support Program | **Fiscal Year 1993** | **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
SUBTOTAL FOR OBJECTIVE #6:			0.600		32,627		
ADDITIONAL FUNDING REQUIRED FOR OBJECTIVE #6:		37,454 (0.68 FTE)					
OBJECTIVE #7: PROVIDE SUPPORT FOR THE BUREAU FOR USE OF STATE AND FEDERAL MAINFRAME COMPUTER SYSTEMS.							
Activities required for the accomplishment of Objective #7:							
A. Provide training and support for staff use of the State and Federal mainframe computer systems.	Ongoing	Don M	0.04		1,782	EPA-106	A
					421	STATE-HWC	
	Ongoing	Alan H	0.04		2,160	EPA/NPS	A
		0.32 FTE NEEDED				NEEDED	C
EPA/106 FUNDING SUBTOTAL:			0.032		1,782		
STATE/HWC FUNDING SUBTOTAL:			0.008		421		
EPA/NPS FUNDING SUBTOTAL:			0.040		2,160		
SUBTOTAL FOR OBJECTIVE #7:			0.080		4,363		
ADDITIONAL FUNDING REQUIRED FOR OBJECTIVE #7:		17,626 (0.32 FTE)					
OBJECTIVE #8: COORDINATE STATE-EPA DATA MANAGEMENT (SEDM) ACTIVITIES.							
Activities required for the accomplishment of Objective #8:							

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
A. Assess needs, prepare grant requests and administer grants under the SEDM program.	Ongoing	Abe H	0.06		2,674	EPA-106	A
					631	STATE-HWC	
	Ongoing	Don M	0.10		4,456	EPA-106	A
					1,052	STATE-HWC	
B. Advanced Revelation program development for Bureau sections' data management and integration.	Ongoing			14,300		EPA/SEDM	A
C. Purchase of two additional Global Positioning System receivers for expansion of Bureau's current GPS capability.	Ongoing			12,700		EPA/SEDM	A
EPA/106 FUNDING SUBTOTAL:			0.129		7,130		
STATE/HWC FUNDING SUBTOTAL:			0.031		1,683		
EPA/SEDM FUNDING SUBTOTAL:				27,000			
SUBTOTAL FOR OBJECTIVE #8:			0.160		8,813		
OBJECTIVE #9: PROFESSIONAL DEVELOPMENT.							
Activities required for the accomplishment of Objective #9:							
A. Attend EPA conferences and seminars; attend specialized training courses;	Ongoing	Abe H	0.02		891	EPA-106	B
					210	STATE-HWC	
	Ongoing	Tom R	0.02		551	DSL	B

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
					297	STATE-RIT	
					253	EPA/205J	
	Ongoing	Don M	0.03		1,337	EPA-106	B
					316	STATE-HWC	
	Ongoing	Pam D	0.04		2,176	EPA/PWSS	B
	Ongoing	Alan H	0.07		3,780	EPA/NPS	B
B. Read professional literature.	Ongoing	Abe H	0.02		891	EPA-106	C
					210	STATE-HWC	
	Ongoing	Tom R	0.02		551	DSL	C
					297	STATE-RIT	
					253	EPA/205J	
	Ongoing	Don M	0.01		446	EPA-106	C
					105	STATE-HWC	
	Ongoing	Pam D	0.02		1,088	EPA/PWSS	C
	Ongoing	Alan H	0.05		2,700	EPA/NPS	C
EPA/106 FUNDING SUBTOTAL:			**0.065**		**3,565**		
STATE/HWC FUNDING SUBTOTAL:			**0.015**		**841**		

Planni Matrix

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ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
DEPARTMENT OF STATE LANDS (DSL) FUNDING SUBTOTAL:			**0.020**		**1,102**		
STATE RIT FUNDING SUBTOTAL:			**0.011**		**594**		
EPA/205J FUNDING SUBTOTAL:			**0.009**		**506**		
EPA/PWSS FUNDING SUBTOTAL:			**0.060**		**3,264**		
EPA/NPS FUNDING SUBTOTAL:			**0.120**		**6,480**		
SUBTOTAL FOR OBJECTIVE #9:			**0.300**		**16,352**		
OBJECTIVE #10: COMPUTER SUPPORT FOR ECOSYSTEMS MANAGEMENT SECTION.							
Activities required for the accomplishment of Objective #10:							
A. Retrieve information from the WATERBODY SYSTEM in the format required by the latest 305(b) guidance;	Ongoing	Alan H	0.07		3,780	EPA/NPS	A
B. Establish and maintain a computerized system to manage NPS demonstration project monitoring data and enter data as it becomes available;	Ongoing	Alan H	0.09		4,860	EPA/NPS	A
C. Maintain, operate and update the WATERBODY SYSTEM (WBS);	Ongoing	Alan H	0.14		7,560	EPA/NPS	A
D. Establish, maintain, operate, and update the Biological Data System (BIOD);	Ongoing	Alan H	0.11		5,940	EPA/NPS	A

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
E. Establish, maintain, operate, and update the NPS stream Reach Tracking System (RTS);	Ongoing	Alan H	0.11		5,940	EPA/NPS	A
F. Compile data from stream reach assessments previously completed.	Ongoing	Alan H	0.07		3,780	EPA/NPS	A
SUBTOTAL FOR OBJECTIVE #10 (and EPA/NPS FUNDING):			**0.590**		**31,860**		
OBJECTIVE #11: DATA MANAGEMENT FOR PUBLIC WATER SUPPLY PROGRAM.							
Activities required for the accomplishment of Objective #11:							
A. Develop Lead and Copper Rule software;	9/15/92	Pam D	0.12		6,528	EPA/PWSS	A
B. Develop Phase II/V tracking software;	11/15/92	Pam D	0.12		6,528	EPA/PWSS	A
C. Develop inorganic tracking software, including nitrates;	1/1/92	Pam D	0.12		6,528	EPS/PWSS	A
D. Develop turbidity and chlorine compliance software for surface water treatment plants;	4/8/93	Pam D	0.04		2,176	EPA/PWSS	A
E. Develop capability to import LIMS data;	8/20/92	Pam D	0.06		3,264	EPA/PWSS	A
F. Move inorganic data, including nitrates, from mainframe to PWSP PC system;	2/1/93	Pam D	0.06		3,264	EPA/PWSS	A
G. Continue electronic FRDS reporting;	Ongoing	Pam D	0.04		2,176	EPA/PWSS	A
H. Generate chemical and inventory printouts for counties;	9/7/92	Pam D	0.02		1,088	EPA/PWSS	A

Planni Matrix

Technical Studies and Support Program **Fiscal Year 1993** **By: Abe Horpestad**

ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
I. Convert to AREV 2.1;	3/5/93	Pam D	0.02		1,088	EPA/PWSS	B
J. Develop long-term coliform MCL software;	6/30/93	Pam D	0.06		3,264	EPA/PWSS	B
K. Develop AREV subset for Billings office;	1/1/93	Pam D	0.02		1,088	EPA/PWSS	B
L. Move radiological data from mainframe to PWSP PC system;	2/1/93	Pam D	0.02		1,088	EPA/PWSS	B
M. Develop method to archive AREV data;	5/10/93	Pam D	0.02		1,088	EPA/PWSS	B
N. Develop chlorine residual monitoring software database users;		0.04 FTE NEEDED				NEEDED	C
O. Develop sanitary tracking software;		0.10 FTE NEEDED				NEEDED	C
P. Develop plan for labs to report electronically;		0.04 FTE NEEDED				NEEDED	C
Q. Develop data verification/validation plan;		0.12 FTE NEEDED				NEEDED	C
R. Write data flow manual for Public Water Supply Program.		0.08 FTE NEEDED				NEEDED	C
SUBTOTAL FOR OBJECTIVE #11 (and EPA/PWSS FUNDING):			0.720		39,168		
ADDITIONAL FUNDING REQUIRED FOR OBJECTIVE #7:		20,672 (0.38 FTE)					

Planni Matrix

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ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	
EPA/106 FUNDING SUBTOTAL:			2.751		151,508		
STATE/HWC FUNDING SUBTOTAL:			0.649		35,762		
DEPARTMENT OF STATE LANDS (DSL) FUNDING SUBTOTAL:			0.500		27,539		
STATE RIT FUNDING SUBTOTAL:			0.270		14,869		
EPA/205J FUNDING SUBTOTAL:			0.230		12,668		
EPA/PWSS FUNDING SUBTOTAL:			1.000		54,400		
EPA/NPS FUNDING SUBTOTAL:			1.000		54,000		
EPA/SEDM FUNDING FOR CONTRACTS AND EQUIPMENT SUBTOTAL:					27,000		
VENDOR CONTRACTS SUBTOTAL:					1,000		
FUNDING GRAND TOTAL FOR TECHNICAL STUDIES and SUPPORT PROGRAM			**6.400**		**378,746**		
TOTAL UNFUNDED ACTIVITIES FOR TECHNICAL STUDIES and SUPPORT PROGRAM			**5.375**		**296,072**		

Planni Matrix

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ACTIVITY/OUTPUT	MILESTONE	PERSONNEL	RESOURCES				PRIORITY
			FTE	CONTRACTED SERVICES	TOTAL $	FUNDING SOURCE(S)	

106 MEANS FUNDS FROM EPA UNDER SECTION 106 OF THE FEDERAL CLEAN WATER ACT

STATE-HWC MEANS HAZARDOUS WASTE, COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION and LIABILITY ACT,(CERCLA) FUNDS USED AS STATE MATCH

DSL MEANS FUNDS FROM THE DEPARTMENT OF STATE LANDS

EPA/205J MEANS FUNDS FROM EPA UNDER SECTION 205J OF THE FEDERAL CLEAN WATER ACT

STATE-RIT MEANS STATE FUNDS FROM THE RESOURCE INDEMNITY TRUST

EPA-SEDM MEANS FUNDS FROM THE STATE EPA DATA MANAGEMENT PROGRAM

EPA/PWSS MEANS FUNDS FROM EPA UNDER THE DRINKING WATER PROGRAM

EPA/NPS MEANS FUNDS FROM EPA UNDER THE NONPOINT SOURCE PROGRAM

AMOUNTS SHOWN ARE APPROXIMATE DUE TO ROUNDING ERRORS

1 FTE = 1992 WORK HOURS THUS .02 FTE = ABOUT ONE WEEK

COSTS SHOWN WERE DERIVED BY DIVIDING PROGRAM COST LEST CONTRACTS BY THE NUMBER OF EMPLOYEES

- SALARY FOR ABE H, TOM R, DAN F, MARL G,and DON M ARE BASED ON AN ANNUAL FTE EXPENSE OF $ 55,080.
- SALARY FOR PAM D IS BASED ON AN ANNUAL FTE EXPENSE OF $ 54,400.
- SALARY FOR ALAN H IS BASED ON AN ANNUAL FTE EXPENSE OF $ 54,000.

SOLID AND HAZARDOUS WASTE MANAGEMENT

The disposal of solid waste has become a major, complex problem in Montana. Due to its nature, it also relates to air, water and land pollution. In the future, the solid waste problem will become more expensive and complicated.

Our society consumes enormous quantities of material and energy which, in turn, generates an exceedingly large volume of waste. Approximately 700,000 tons of municipal solid wastes are being generated every year in Montana. Presently, waste is being disposed of in more than 95 identified municipal disposal facilities, 37 inert material disposal facilities and 112 transfer and storage facilities.

State records also indicate that approximately 10,000 tons of hazardous wastes are generated each year in Montana. This volume of hazardous waste includes pesticides, heavy metals and other industrial chemical wastes. A large number of "empty" pesticide and other toxic chemical containers of all sizes are also discarded annually.

The state now possesses sufficient regulatory authority to control solid waste disposal. As required by the 1977 "Montana Solid Waste Management Act," the DHES currently is licensing all solid waste management systems in the state. This licensing procedure assures that all such systems will provide a basic public service and not degrade the environment. A FY 93 priority for the Solid Waste Program will be to revise and rewrite current Solid Waste Management Rules to conform with the standards and requirements of the newly promulgated Federal Subtitle D rules. Such changes will allow the program to pursue state program "approval" by the EPA. The "approval" of the state program will provide the program with complete state authority over all solid waste management facilities and would include primacy in licensing, monitoring and enforcement activities.

Montana, through the department has received "final" authorization to manage a state Hazardous Waste Management Program. However, because of major changes in RCRA, the DHES is initiating major program development activities to insure that the state program remains equivalent to its federal counterpart. The following number of businesses have filed notifications under the hazardous waste program:

Large Generators	72
Small Generators	155
Conditionally Exempt Generators	314
Treatment, Storage and Disposal Facilities	11
Transporters	39

A fee system has been established to assist in the management of a state Hazardous Waste Program and a Solid Waste Management Program. Under the system, hazardous waste generators and

treatment, storage and disposal facilities, as well as all solid waste management facilities are required to pay a fee to the state to help defray the costs of managing the state programs.

During FY 1993 a priority will be continued progress toward a fully authorized state hazardous waste regulatory program, and maintenance of that portion that is currently authorized. Such status encompasses complete state authority over hazardous waste generators, transporters and treatment, storage and disposal facilities. This authority will provide state primacy in permitting, monitoring and enforcement activities. The program will include continuing the notification procedures by regulated communities of hazardous waste activities.

The DHES will continue to provide an emergency response system, which includes a response plan and participation in an emergency response team. This team is comprised of state agencies representing a broad spectrum of disciplines. Such a structure assures that state government can provide technical advice and assistance to a variety of emergency situations.

As the state's Hazardous Waste Program matures, measures will be taken to assure that an adequate work force is available. Efforts will be made, as needed, to supplement the current hazardous waste staff. In addition, the ongoing training of current staff will be maintained.

A concerted effort will be made to include public participation. Current state laws and regulations include formal provisions for insuring public review and comment in the issuance of all permits. The level of public participation undertaken in other activities will depend on the degree of interest from affected or interested persons. Public participation will rely heavily on the mass media, direct mailings, public meetings and public hearings.

Removals, remedial investigations, feasibility studies, and remedial actions are ongoing at all of the eight uncontrolled hazardous waste sites currently on the Federal National Priority List (NPL). The DHES has entered into five cooperative agreements with the EPA to implement and oversee the CERCLA process and meet the states responsibilities under the law.

The CORE Cooperative Agreement provides support for implementation of the EPA Superfund priorities in Montana.

The Multi-Site Cooperative Agreement provides funding for the DHES support agency assistance activities at the EPA lead sites and for a pre-remedial investigation program.

The state Superfund Program has had a high rate of staff turnover due to the expanding opportunities in this area of work. Realignment of sites and responsibilities to match available resources is an ongoing responsibility.

Currently, the DHES has lead management responsibility for the Silver Bow Creek Streamside Tailings operable unit and the Montana Pole site. Specific work efforts and commitments may be found in the cooperative agreements for these sites. The DHES also participates in the coordination of the Clark Fork River system sites. As funding becomes available for the Mouat Industries site or other new sites, the DHES will negotiate additional cooperative agreements for lead or support agency assistance at these sites.

The DHES has an important role in the identification and evaluation of sites for inclusion on the NPL. Under provisions of the Multi-Site Cooperative Agreement, the DHES conducts preliminary assessments (PA), and where necessary, site investigations (SI) of potentially uncontrolled waste sites identified in the EPA's CERCLA information system (CERCLIS). The DHES has also been approved to prepare HRS packages for sites qualifying for NPL status. At present, Montana has 207 sites on CERCLIS. To date, 199 PAs and 75 SIs have been completed. In the course of conducting project activities, efforts will be made to identify uncontrolled hazardous waste sites not listed on CERCLIS.

The Montana Office FY93 Superfund anticipated commitments are as follows:

- Record of Decision (ROD)-(1)
  Montana Pole-State Lead-93/3

- Action memorandum signed-(1)
  Silver Bow Creek/Butte (OU10)-EPA Lead-93/1

- Remedial Design/Remedial Action Negotiation start-(1)
  Montana Pole-State Lead-93/4

- Remedial Design/Remedial Action Negotiation complete-(2)
  Idaho Pole-EPA Lead-93/2
  Silver Bow Creek/Butte (OU12)-EPA Lead-93/2

- Remedial Design start-(2)
  Idaho Pole-EPA Lead-93/2
  Silver Bow Creek/Butte (OU11)-EPA Lead-93/3

- Remedial Design complete-(1)
  Anaconda Smelter (OU11)-EPA Lead-93/4

- Remedial Action start-(1)
  Anaconda Smelter (OU11)-EPA Lead-93/4

- Consent Decree Referral-(1)
  Silver Bow Creek/Butte (OU12)-EPA Lead-93/2

- Unilateral Administrative Order Referral-(1)
  Idaho Pole-EPA Lead-93/2

SFY 93
SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
HAZARDOUS WASTE	TOTAL				14.66	4.02	$210,450	$631,348	
I. Program Development/Management									
A. Develop and submit authorization applications.					.40	.20			SHWB/EPA
1. Submit final application for all revisions up to and including Non-HSWA Cluster 4.	X								
2. Submit draft application for Non-HSWA Cluster 5 and HSWA cluster 1.	X								SHWB
3. Submit final application for Non-HSWA Cluster 5 and HSWA Cluster 1.			X						SHWB
4. Submit draft application for Bevill Exclusion and TC rule changes.		X							SHWB
5. Submit final application for Bevill Exclusion and TC rule changes.				X					SHWB
6. Submit draft application for Non-HSWA 6 and HSWA 2.				X					SHWB
B. Develop or update program documents					.10	.10			
1. Enforcement Agreement.				X					SHWB/EPA
2. Multi-year Compliance Monitoring Strategy with penalty policy (Refer to "National Criteria for a Quality Hazardous Waste Program under RCRA - July 1986).		X							SHWB/EPA
3. Negotiate & develop FY94 work plan.				X					SHWB/EPA
4. RCRIS Memorandum of Understanding.		X							SHWB/EPA

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1 2 3 4	RESOURCES WORKYEARS STATE	WORKYEARS EPA	DOLLARS STATE	DOLLARS EPA	RESPONSIBLE AGENCY
5. Multi-year Permitting Strategy.	X					SHWB/EPA
C. Develop & implement cooperative agreement for non-authorized HSWA functions.	X	.10	.10			SHWB/EPA
1. Corrective Action Activities						
2. Land Ban Inspections						
3. Waste Oil Inspections program						
4. Small Quantity Generators						
5. Subpart X Facilities						
6. Burning H.W. in Boilers						
7. Toxicity Characteristic Rule						
8. HSWA Permit Modifications						
9. Bevill Amendment						
10. Wood Treating Wastes						
11. Air Emissions						
D. Waste Minimization Program (Refer to EPA Region VIII Strategy for Implementing EPA's Waste Minimization Policy under Subtitle C of RCRA.)		.30				SHWB
1. Solvent Registration Implementation	Ongoing					SHWB
2. Develop program for Waste Minimization including:	Ongoing					SHWB
o review of permits for potential for waste minimization requirements,						
o identify waste streams & provisions for waste minimization during inspections,						
o include waste minimization requirements in enforcement settlements, as appropriate.						

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1 2 3 4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
E. Training		.40	.01			
1. Staff						
a. Update Training Plan	X					SHWB
b. Implement Staff Training Plan	Ongoing					SHWB
2. Public Education						
a. Waste Minimization	Report on Accomplishments during regularly scheduled program reviews.					SHWB
b. Other	As needed					SHWB
3. Process Training Needs	Ongoing					EPA
4. Inform State of available training	Ongoing					EPA
F. Prepare and Submit Documentation to EPA		1.66	.01			
1. SEA Commitment Progress	X X					SHWB
2. Status of Rule Development (by Cluster and Checklist Number) for authorization	X X					SHWB
3. Implementation (cost & courses for each employee) of training plans	X X					SHWB
4. Enforcement Orders, closure plans, new facility information, permits, public notices, and corrective action per MOA	As mailed to facility					SHWB
5. Inspection reports and subsequent enforcement	Refer to Appendix D of SEA					SHWB
6. Enter data directly into RCRIS	Ongoing					SHWB/EPA

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
7. Conduct Annual Report Effort									
a. Mail forms		X							SHWB
b. Follow up on non-response			X						SHWB
c. Prepare data for entry into data base				X					SHWB
d. Advise on, monitor and ensure efforts	X	X	X	X					EPA
G. Inform EPA of legislative, regulation or judicial changes to State HW program per MOA	As appropriate				.10				SHWB
H. Participate in RCRIS process as per MOU	Ongoing				.20		.01		SHWB/EPA
I. Attend RCRIS User Group Meetings	As scheduled								SHWB/EPA
J. Evaluate Quality Assurance Plan and update, if necessary				X					SHWB/EPA
K. Attend semi-annual Regional HW director's meeting		X		X					SHWB
L. Capacity Assurance Plan Process									
1. Dialogue with other participating States	Ongoing				.15				SHWB
2. Revise/update State CAP				X					

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
II. Implement State Hazardous Waste Program									
A. Compliance Inspections					3.50	.60			SHWB/EPA
1. TSD's									
a. Ground water monitoring facilities									
(1) Compliance Evaluation Inspection (3 CEIs will be performed during the 3 CMEs/O&M inspections)	2	3	1	3					SHWB
(2) Comprehensive Ground Water Monitoring Evaluation (CME) or Operation & Maintenance (O&M). (Refer to "EPA Region VIII, Comprehensive Groundwater Monitoring Evaluation Quality Criteria Policy")	2			1					SHWB/EPA
b. Non-ground water monitoring facilities	1		2						SHWB/EPA
c. Record reviews									
(1) Financial			3	6					SHWB
(2) Non-financial	As required								SHWB
2. Large generators/transporters	7	8	2	8					SHWB
3. Non-notifiers	6	4	3	7					SHWB
4. Follow-up	As Required								SHWB
5. Sampling	As Required								SHWB
6. Citizen complaints	As Received								SHWB
7. Federal Facilities (joint)	Included in A.1.b								SHWB/EPA
8. State/Local (joint)			1						SHWB/EPA

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
B. Manifest Exception and Discrepancy Reports reviewed.	As Required								SHWB/EPA
C. Update Facility Management Plans (See permitting and enforcement sections).	X	X	X	X					SHWB/EPA
D. Permitting/Facility Management. (Refer to Facility Management Plans)						4.50		2.25*	
1. Operating Permits									SHWB/EPA
a. Review permit applications			1**						
b. Issue notice of deficiency				1					
c. Review notice of deficiency response									
d. Public notice		1							
e. Issue final permits		1							
2. Closure/Post Closure Permit									SHWB/EPA
a. Review permit applications		1							
b. Prepare notice of deficiency			1						
c. Review notice of deficiency response	1			1					
d. Draft permits		1							
e. Public notice	1		1						
f. Issue final permits		1		1					

* Includes Denver Office resources for permit review issuance.

** Assumes submittal of Part B by MSE in third quarter

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
									SHWB/EPA
3. Modify Operating Permits									
a. Notice of deficiency issued	1	1							
b. Modify Permit	2	1	1						
c. Public Notice	2	1	1						
d. Issue final modification		2	1	1					SHWB/EPA
4. Solid waste management units/corrective action (EPA lead)									
a. Issue HSWA permit			3						
b. RFI Work Plan Approval			1						
c. Implement stabilization measures				1					
						2.25		.10	SHWB/EPA
F. Enforcement (timely and appropriate response to all noncompliance found)									SHWB
1. Take appropriate enforcement action to bring into compliance	Refer to Appendix D of SEA								SHWB
2. Other Enforcement									
a. Warning letters	Report and summarize at mid-year and end. See Enforcement Agreement for Items a. through h.								
b. Notices of violation									
c. Compliance orders									
d. Administrative orders									
e. Civil actions									
f. Criminal actions									
g. Referrals to Attorney General									
h. Referrals to EPA									

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
G. EPA Oversight						.64			EPA
1. Inspections	1	1		1					
2. Enforcement actions	See Enforcement Agreement								
3. Permit reviews	3	1	1						
4. Closure/post closure (includes permit review)	1	1							
5. State program audits		1		1					
6. Financial assurance mechanism review	Ongoing								
III. Assist EPA in Implementation of HSWA through cooperative arrangement until authorized for:						1.0			SHWB
A. Inspections (Number)									
1. Small Generators (20)	8	4	2	6					
2. Waste Oil (3)	1			2					
3. Land Ban (4)	1	1	1	1					
4. Burning Haz. Waste in Boilers (1)			1						
5. Toxicity Characteristic Rule (5)		1	2	2					
6. Bevill Amendment (1)		1							
B. Other Activities									
1. Participate with EPA in Corrective Action and Subpart X activities.	Ongoing								

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
SOLID WASTE	TOTAL				14.0	.10	685,089		
I. Maintain Solid Waste Management Program									SHWB
A. Compliance Inspection and Enforcement					4.5				SHWB
1. Continued maintenance of a waste management inspection program.	75	75	75	75					
2. Prepare and initiate legal enforcement actions where violations of license conditions have occurred.	2	2	2	2					
3. Follow-up inspections where enforcement and compliance action has taken place.	As required.								
4. Complaint investigation	6	6	6	6					
B. Assist local landfill owners/operators with plans for future waste disposal needs and implementation of Subtitle "D" requirements.					1.0				SHWB
C. Permitting Solid Waste Management Facilities					4.5				SHWB
1. Application Review	4	4	4	4					
2. Prepare Notice of Deficiency	6	6	6	6					
3. Prepare Environmental Assessments	4	4	4	4					
4. Public Notices/Meetings	6	6	6	6					
5. Issue Licenses	4	4	4	4					
6. Annual License Renewal			250						
7. Closure/Post Closure Review	1	1	1	1					
a. Inspection and enforcement									

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
D. Revise Montana Solid Waste Management Rules to Current Subtitle D Standards					2.0	.10			SHWB
1. Submit draft application to EPA for State program approval and implementation.		X							SHWB/EPA
2. Submit final application to EPA for State program approval and implementation.			X						SHWB/EPA
E. Prepare Montana Solid Waste Management Plan	Ongoing				1.5				SHWB
1. Collect and disseminate information on recycling plans and opportunities.									
2. Provide public information on recycling.					.5				SHWB
F. Training									
1. Provide training to landfill managers and operators on basic system operations and compliance with State laws and rules and Subtitle D.	Ongoing								
2. Provide training and education to public on household hazardous waste issues.	Ongoing								

UNDERGROUND STORAGE TANK/LEAKING UNDERGROUND STORAGE TANK (UST/LUST) TRUST PROGRAM

The major priorities for the Solid and Hazardous Waste Bureau's UST/LUST program for FY 1993 include:

- Operate and enforce existing UST programs,
- Implementation of state petroleum release compensation fund,
- Provide assistance to local governments and the public,
- Implementation of installer licensing and installation and closure permit program,
- Public outreach to obtain voluntary compliance,
- Program authorization application and
- Corrective action program implementation for state and federal plans.

The legislative mandates for the UST Program will continue to be carried out during FY 1993. This includes the programs for the permitting of UST installations, repairs and closures and for the licensing of installers and inspectors. During FY 1993, the UST program will continue to designate and train local governmental agencies as Local Governmental Units to implement compliance inspection programs at the local level. A contractual program has been implemented to reimburse local governmental units for LUST corrective action oversight. State grants to implementing agencies will be made available for program service reimbursement. Training and grants for inspection equipment will also be available.

A LUST Trust cooperative agreement and funding are in place to authorize and implement corrective action efforts. The DHES will use federal LUST Trust funds and the availability of a new state cleanup reimbursement fund to accomplish satisfactory corrective actions. The DHES will continue its outreach and education efforts to obtain compliance and streamline the corrective action review process. Enforcement actions will be taken when necessary to emphasize the need for voluntary program compliance. Efforts will be made to cost recover LUST Trust funds in FY 1993.

Contact Persons:

Solid and Hazardous Waste Bureau, DHES (444-1430)
Duane Robertson, Chief
Vic Andersen, Superfund Section
Roger Thorvilson, Waste Management Section
John Geach, Underground Storage Tank Program

EPA Montana Office (449-5414)
Stephanie Wallace, Environmental Scientist
Eric Finke, Chief, Air, Hazardous Waste and Toxic Branch
Don Pizzini, Chief, Superfund Branch

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
LEAKING UNDERGROUND STORAGE TANKS TRUST FUND									SHWB, EPA
I. LUST Trust Fund Implementation									
A. Review and revise core program tasks as outlined in LUST corrective action workplan			1			.2			
B. Submit SFY 94 LUST Cooperative Agreement application				1		.1			
C. Provide training/technical assistance for regulated community, affected industry & LGUs in corrective action procedures		1		1		.2			
D. Maintain corrective action status tracking system	ongoing					.8			
E. Implement the following elements of corrective actions									
1 Select LUST Trust contractors				1					
2 Conduct site investigations	15	15	15	15					
3. Conduct corrective action plan review	ongoing					1.5			
4 Initiate cost recovery actions	ongoing					5			
F Report quarterly on 15th day following quarter end	1	1	1	1		1			
G. Conduct corrective action streamlining efforts and develop QA plan with EPA contractual assistance				1		2			

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
II. EPA Oversight						.4			
A. Conduct joint LUST Trust site investigations	As requested								
B. Provide technical assistance	As requested								
C. Provide training	As needed								
	Total				5.5	.4	72,000	720,000*	

* includes funds designated for use on Indian lands

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
UNDERGROUND STORAGE TANKS									
I. UST Program Development and Implementation									SHWB
A. Implement UST Installer rules	Ongoing				.2				
B. Maintain State funding mechanism	Ongoing								
D. Submit application for authorization - request final approval	1		1		.2				
E. Apply for SFY 94 UST assistance				1	.1				
F. Maintain procedures for compliance monitoring and enforcement program	Ongoing				.5				
G. Maintain UST notification data base	Ongoing				.25				
H Provide timely compliance assistance to O/O for phased-in requirements for release detection and financial responsibility	Pamphlets on closure, UST management, cleanup, etc - Ongoing or as needed and requested				1.0				
I. Obtain technical assistance/training for state staff	As required				.25				
J Provide technical assistance/training to local program implementation staff	Ongoing				.25				
K. Implement program for UST installer permits	Ongoing				.25				

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
L. Implement UST installer/inspector license program	Ongoing				.2				
II. Compliance, Monitoring and Enforcement									SHWB, EPA
A. Identify, investigate and attempt to resolve violations of state and federal rules with emphasis on leak detection violations	As required				.5				
B. Advise and educate regulated community regarding compliance alternatives	2	2	2	2	.25				
C. Conduct UST compliance inspections	20	15	15	20	.3				
D. Conduct joint UST compliance inspections with EPA emphasizing leak detection violations	8			8	.25	.1			
E. Refer potential enforcement cases to EPA for action, including issuing citations	As appropriate					.1			
F. Encourage State/EPA coordinated planning and decision making regarding potential and actual multimedia enforcement cases. (Focus on Federal facilities)	As appropriate								
III. EPA Oversight									
A. Advise/assist with UST Program Development	Ongoing					.4			EPA
B. Refer inquiries, complaints to State	As needed								
C. Assist State with authorization application									

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SOLID AND HAZARDOUS WASTE MEDIA WORK PLAN

ACTIVITY/OUTPUT	QUARTERLY MILESTONES 1	2	3	4	RESOURCES WORKYEARS STATE	EPA	DOLLARS STATE	EPA	RESPONSIBLE AGENCY
D. Assist State with implementation of approved State Program and MOA	As needed								
E. Assist State with contractual assistance in leak detection, compliance monitoring enforcement efforts and State program approval	As needed								
G. Provide training/secure training opportunities for State staff	As needed								
			TOTAL		4.5	.6	54,166	162,500	

PESTICIDE PROGRAMS ACTIVITIES FOR FY 1993

BACKGROUND

The Agricultural and Biological Sciences Division (ABSD), of the Montana Department of Agriculture (MDA), has a responsibility to serve Montana agriculture and protect the environment and the health of the state's citizens. The ABSD administers a pesticide applicator and dealer licensing, permitting and certification program and a pesticide enforcement program.

Recertification schedules for all classes of pesticide applicators have been established. Farm applicators certified to use restricted-use pesticides are on a five year requalification cycle, with applicators in one of the five agricultural districts being recertified each year. Commercial applicators and dealers are on a four year recertification schedule. The applicator categories have been divided among the four year period, so not all categories are due for recertification or relicensing the same year.

The ABSD provides pest management services to producers, industry, government agencies and the general public. These services include providing information on integrated pest management procedures for specific cropping systems, recommendations on use of pesticides, identification and limited surveillance of pests; and the evaluation and resolution of the effects of pesticides on agriculture and the environment. The division also registers pesticide products (5,130) prior to their use in the state; licenses pesticide dealers (504), commercial and government applicators (1,475) and their licensed operators (1,161); licenses private applicators (8,445) and regulates the use and sale of pesticides. The department's analytical laboratory provides regulatory and service analyses to other departmental programs and to the general public.

Agricultural specialists conduct routine inspections and investigate incidents and alleged violations to ensure compliance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) and the Montana Pesticide Act (MPA). The ABSD maintains five field offices each staffed by an agricultural specialist to conduct enforcement activities and to provide testing and licensing services.

The MDA utilizes an enforcement response policy related to pesticide complaints and investigations as required by EPA.

The laboratory follows the EPA approved quality assurance program for all enforcement samples. Non-regulatory environmental samples follow quality assurance procedures if requested by the submitter. The laboratory participates in the EPA check sample and sample check analysis procedure programs.

A pesticide groundwater sampling program was started in FY 1984. Since then, new sample sites have been added each year, as well as re-sampling some positive wells, to determine what was happening to the residue levels. As groundwater monitoring strategies have become available from other states, as well as on the federal level, the MDA has modified its monitoring scheme so results obtained here can be compared with those obtained elsewhere. As health guidance information becomes available on other pesticides, monitoring may have to be increased or decreased, depending upon the quantity and degree of use in the state of any particular pesticide. The Montana Agricultural Chemical Ground Water Protection Act was passed by the 1989 Legislature and the provisions of the act went into effect January 1, 1990.

ABILITY TO IMPLEMENT PROGRAM

The MDA certifies that there are no known impediments to Montana's ability to carry out the proposed pesticide program.

The MDA's authority for registering pesticides, licensing and certifying applicators, licensing dealers and operators and conducting inspections and pursuing enforcement actions is provided for in the Montana Pesticides Act, Sections 80-8-101 through 306, MCA.

The State of Montana has participated in a Pesticide Cooperative Agreement with the EPA since 1979. Approval of the FY 1992-93 budget by the Legislature and the Governor provides authority to accept federal pesticide funds as the state lead agency for pesticides in Montana. The MDA proposes to continue the comprehensive cooperative enforcement program with EPA through inspections, investigations, pesticide sampling, laboratory pesticide analysis and enforcement actions. These activities would be continued under the quality assurance agreements made with EPA under previous grants. The MDA's pesticide specialists hold credentials and have the authority to uphold the mandates of the FIFRA as well as the Montana Pesticides Act.

The Montana Pesticides Act, Section 80-8-101, MCA provides that the MDA may cooperate with federal agencies in carrying out provisions of the act. The MDA has been granted "primacy" under Section 26 of FIFRA, as amended. It is the intent of the department to serve as the primary agency in conducting inspections, investigations, and sample collection and analysis in accordance with EPA approved procedures and to take effective action against violators. The outputs listed in the work plan reflect those that are funded by the EPA grant. Monitoring for residues and potential environmental contamination resulting from the use of Specific Exemption (Section 18, FIFRA), Special Local Need (Section 24(c), FIFRA) and experimental use pesticides will continue in FY 1993.

The MDA's Field Services Bureau and Pesticide Analytical Laboratory will continue to maintain the quality assurance program for sample handling and analysis. The laboratory will provide pesticide analytical services to EPA and other states in Region VIII on a fee basis which will cover the cost of supplies, materials and communications.

OBJECTIVES OF THE PROJECT

- Ensure compliance with pesticide cancellations, suspensions and other major regulatory actions,
- Outline activities to be conducted to ensure compliance with residue removal regulations,
- Conduct a limited number of export inspections,
- Assist, if requested by EPA, with efficacy testing of disinfectant products,
- Planning for and conducting enforcement activities for the revised worker protection standards and associated labeling requirements, based on publication of the final rule,
- Address changes to the certification plan which will be required as a result of revised provisions of 40 CFR 171,
- Develop and upgrade training modules and materials,
- Continue development and implementation of generic and chemical-specific state management plans to protect groundwater resources,
- Provide protection of listed endangered species while minimizing unnecessary impacts on pesticide users,
- Continue development of program implementation strategies for the revised worker protection standards (WPS), and
- Continue development and implement outreach programs (in cooperation with the Extension Service) for the groundwater protection, endangered species and worker protection standards programs.

BENEFITS OF THE PROJECT TO THE APPLICANT AND THE EPA

The project will continue central coordination of pesticide activities in the MDA and will reduce duplication of operations and capital expenditures. The project will establish consistency in approach and objectives that are appropriate for the state. The regulated community in Montana will have the benefit of dealing with a state agency with six offices located throughout the state. This will provide rapid, local responses to problems and easier access to pesticide officials.

Communication will also be continued between EPA and Montana providing understanding of local and regional issues and differences in pesticide usage. The state can provide meaningful interpretation and implementation of national issues and priorities.

SUBMITTING REPORTS

Any report or other items required to be submitted to the EPA Regional Office will be submitted to the EPA Montana Office.

ACCOMPLISHMENTS IN FY 1992

I. Certification

The MDA's Technical Services Bureau met or exceeded all of the outputs listed under the FY 1992 certification program. Certification credentials were issued to 5,349 individuals, and information on regulatory and certification requirements was provided to the regulated community and the general public on a daily basis. Two training manuals were revised in FY 1992. One has been published and the other will be published early in FY 1993.

II. Enforcement

The MDA's Field Services Bureau met or exceeded the basic projected sampling and inspection outputs as agreed to in the 1992 media work plan. Where difficulties were encountered in meeting projections for some inspection types (experimental use, export), this was compensated for by exceeding inspections in other categories.

The Laboratory Bureau exceeded or met all of its projected outputs for FY 1992.

CERTIFICATION AND TRAINING OF PESTICIDE APPLICATORS

I. Work Program Requirements

A. Revisions to State Mechanisms to Determine Competency of Certified Pesticide Applicators.

The MDA has implemented revisions to state mechanisms for certification/recertification of pesticide applicators (including examinations and training sessions) as previously agreed upon between the EPA project officer and the state. This effort also applies to any revisions agreed upon as a result of the FY 1988/89 joint reviews, but not fully implemented by FY 1992.

The lone remaining issue from the FY 1989 joint EPA/USDA private applicator certification review is initial private applicator certification at recertification courses. Private applicators may still be certified with a four hour training course and an ungraded quiz. The MDA and the Extension Service are still considering methods of resolution within existing resources. This may be a moot issue depending on what the final 40 CFR 171 regulations require.

B. Maintenance and Revisions to State Certification Program or Plan

The MDA has implemented changes to state certification programs/plans which were agreed upon between the state and EPA as a result of the FY 1987 and subsequent discussions on state certification plans.

C. EPA Regional Program Office of Review of State Revisions of Certification/Recertification Examinations

Revisions to certification/recertification examinations will include review on an as needed basis by the EPA Regional Program Office to assure that, in addition to the other topics required by federal regulations, the exams include information on:

1. Chronic health effects,
2. Groundwater contamination,
3. Endangered species,
4. Disposal methods,
5. Calibration of dispersal equipment,
6. Proper use, maintenance and disposal of personal protective equipment and clothing,
7. Applicator laws and responsibilities and
8. Significant pesticide use problems identified through enforcement actions.

When the EPA identifies areas in the examinations that need amendment, the MDA will work with EPA to make needed changes.

D. State Coordination of Training Programs and Materials with the State Cooperative Extension Service and Other Training Providers.

The MDA meets a minimum of twice each year with the state Cooperative Extension Service to discuss and evaluate the state pesticide applicator certification and training programs. These meetings are normally held in September and January each year and the EPA project officer is notified of the dates and times of the meetings. A report of any applicable cooperative agreement decisions will be submitted to EPA with the mid-year and end-of-year reports.

E. State Evaluation of and Participation in Training Programs

The MDA will continue to submit on a quarterly basis information on the number of training sessions participated in or monitored and the number of applicators certified and recertified (including the numbers certified and recertified for each category). A system for evaluating training programs is currently being developed for review.

The MDA will submit information about specific training programs and/or training materials identified as being of high quality.

F. State Plan for Implementing the Revised 40 CFR 171

The proposed revised certification and training regulation, 40 CFR Part 171, was published as a notice of proposed rulemaking in the Federal Register on November 7, 1990. The MDA submitted comments on this regulation prior to the March 8, 1991 deadline. When the final regulation is published the MDA will compare its certification and training requirements with the proposed federal regulation to identify changes that will be needed to implement the regulation. Within six months after the revised 40 CFR 171 becomes final, MDA will submit a plan and schedule to implement the changes in Part 171.

II. Reporting and Evaluation

A. Annual Certification Plan Report

The MDA will submit an annual report as required under 40 CFR Part 171.7(d) on or before September 15, 1993. The report will include the following information.

1. Number of applicators, private and commercial, by category,

   - currently certified

   - certified during the reporting period,

2. Changes in private and commercial categories or subcategories,

3. Summary of enforcement activities related to RUPs during the last reporting period,

4. Significant proposed changes in standards of competency,

5. Proposed changes in plans and procedures for enforcement activities related to use of RUPs for the next reporting period.

B. Mid and End-of-Year Projections and Accomplishments

The mid and end-of-year reports will be submitted to the EPA Regional Office on a schedule corresponding with the State fiscal year (generally, late January and late July). The MDA submits EPA Forms 5700-33H on a quarterly basis which tracks several of the items previously identified in II.A. In addition, the following information will be provided in mid-year (my) or end-of-year (eoy) reports.

1. Status of revisions to exams, study material, etc, previously agreed to between the MDA and the EPA Regional Office (my, eoy).

2. Number of training sessions monitored compared with number projected (my, eoy).

3. Identification of quality training or materials including topic titles and type of presentation format (my, eoy).

4. Any changes in the state program, laws or regulations that have occurred over the past year (eoy).

5. Progress in implemented changes to the Plan which were agreed upon between the MDA and the EPA Project officer (eoy).

6. Total number of applicators (private and commercial) recertified and the number recertified by category (eoy).

7. Number of certifications revoked or suspended for that year and the reasons for each action (eoy).

8. Number of applicators, private and commercial, by category (eoy),

   - certified as of September 30, 1992 and

   - initially certified during the reporting period.

C. Evaluation

The MDA has reviewed the Protocol for the Regional Review of Certification Programs at Mid-and End-of-Year and reserves the right to comment on this document at the appropriate time with the EPA Regional Office.

GROUNDWATER PROTECTION PROGRAM - WORK PROGRAM ACTIVITIES

I. The Work Program

A. Implementation of the State Groundwater Protection Program in accordance with Coordinated Program plans

The implementation plan will include the following components:

1. An outline of how MDA will accomplish the provision and/or requirements of the EPA Pesticides and Ground-Water Strategy pending the receipt of final guidance documents from EPA.

   The MDA has identified the state, federal and local government groups involved with groundwater protection, and has identified their roles and responsibilities in developing and implementing a pesticides in groundwater management plan.

   The MDA has established a working committee to serve as the point of contact for the development of a general management plan. This committee has formalized its schedule for developing the management plan and has submitted it to the EPA Regional Project officer.

2. A framework for conducting groundwater activities, including whether the MDA will opt to develop a generic state management plan or chemical-specific management plans.

   The MDA will develop a generic management plan within six months after receipt of the final guidance documents from EPA. The MDA will develop the chemical-specific components of a management plan in response to designation from EPA regarding a particular pesticide on a case-by-case basis.

3. An estimated time line for the development of either type of plan within EPA guidelines.

   The MDA plans to have a draft Montana General Management plan available by December, 1992. Chemical specific plans will be developed and implemented on an as-needed basis.

4. A description of preparations for communicating the strategy to users and to the public, such as identifying target audiences, establishing mechanisms for the dissemination of information, and conducting public meetings.

Administrative rules have been promulgated which require the MDA to:

a. Sponsor interagency and public meetings,

b. Consult with local, state and federal agencies, universities, agricultural chemical user groups and the public in meeting the objectives and content of the statewide general management plan and local specific management plans,

c. Periodically update management plans if new technologies, agronomic practices, or chemical usage warrants changes in the plans,

d. Develop and distribute (in cooperation with the Montana State University Extension Service) (MSUES) educational material on the subject of agrichemicals and groundwater protection, and

e. Organize and conduct seminars and symposia on the scientific and regulatory aspects of groundwater impairment by agricultural chemicals.

5. A description of plans to develop appropriate infrastructures, and/or memoranda of understanding with other state agencies.

The Montana Agricultural Chemical Groundwater Protection Act outlines the responsibilities of the MDA, DHES and MSUES. For other state agencies with groundwater responsibilities the MDA will develop memoranda of understanding and/or contracts to ensure cooperation and data and information exchange. These agencies include: Department of Natural Resources and Conservation (DNRC), Montana Bureau of Mines and Geology (MBMG), Department of State Lands (DSL), University System (MSU, University of Montana, and Montana Tech) and Montana Association of Conservation Districts (MACD).

6. A description of preliminary monitoring.

A pesticide groundwater sampling program was started in 1984. As manpower and resources have allowed, groundwater monitoring has been conducted in several of the major river valleys in the state. Monitoring of potentially vulnerable groundwater areas in the state is part of an on-going program. Six permanent monitoring sites (selected based on the type of agricultural crops grown there plus several other criteria) have been established and will be monitored on a quarterly basis. The MDA is reviewing the EPA

Minimum Set of Data Elements for Ground Water for possible incorporation as a part of the data collected and maintained by the Ground Water Information Center (GWIC).

B. Work Program Requirements

1. Review and Completion of the Ground Water Protection Program Implementation Plan

The implementation plan and schedule has been prepared but has not been reviewed by the EPA Regional Program office. Upon completion, the plan will be submitted to Regional office.

2. Implementation of Ground Water Protection Plan

The implementation plan and schedule needs to be reviewed and approved by the EPA Regional office. It will be implemented, following EPA concurrence.

3. Development of Generic Management Plan

The MDA has started to develop a generic state management plan and will submit it for review and preliminary approval prior to the 1993 use season if the guidance documents from EPA have been received in a timely manner. A copy of the generic management plan will be submitted to the EPA Regional Office according to the groundwater protection program schedule.

4. Continued Assessment and Identification of Areas Most Vulnerable to Groundwater Contamination by Pesticides

The MDA has begun to assess and identify the areas most vulnerable to groundwater contamination by pesticides in the state. This effort will require monitoring and mapping activities, and will also require coordination with other state agencies and the use of statutory authorities which are currently in place.

To the extent possible, the MDA will identify those aquifers where protection is most critical based on available criteria, which may include use, proximity to the surface, well location, population density, etc. Vulnerability may also be dependent upon climate, type of soil, extent of irrigation, range in pesticide type and application rates, point source contamination and other factors. The MDA has identified several areas for short-term and long-term monitoring to determine the potential for pesticide contamination problems.

5. Outreach Activities

The MDA, in cooperation with MSUES, will conduct an outreach campaign to explain to users and to the public how the EPA groundwater strategy affects them, how the strategy works, what the MDA is doing to respond to the strategy, and how they may be involved.

6. Development of Chemical-Specific Management Plan Components

The MDA will continue to develop the chemical-specific components or a chemical-specific management plan in response to designation from EPA regarding a particular pesticide. The chemical-specific management plan or components will be developed and submitted to the EPA Regional Program Office on a case-by-case basis as specified by EPA, and according to the MDA groundwater protection program schedule.

ENDANGERED SPECIES PROTECTION PROGRAM - WORK PROGRAM ACTIVITIES

I. Work Program for Base Program

The MDA is participating in a base endangered species protection program. The base work program addresses the following activities:

A. Information Response System

The MDA will respond to pesticide user requests for county bulletins once they become available from EPA. The department will continue to provide endangered species information to agencies, users, and the public and will expand this public information effort once more definitive program materials and directives are received from EPA.

The department has developed an endangered species presentation that has been included in commercial and private applicator certification programs. The program is presented by department staff. This allows the presentation to be continually updated to include changes in endangered species restrictions or status. The presentation has information that includes: legislative history of species protection; provisions of the Endangered Species Act (ESA) ; proposed pesticide labeling program, and information about each species in Montana listed under the ESA.

Development of educational videos and educational brochures about endangered species protection is still planned. However, development has been delayed until final rules regarding endangered species protection have been published by EPA.

B. Compilation/Dissemination of Information on Federally-Listed Endangered Species

The work program will also address the following activities concerning federally-listed endangered species:

The department has and will continue to hold meetings with the Fish and Wildlife Service, Endangered Species personnel and the Montana Department of Fish, Wildlife and Parks concerning the Endangered Species/Pesticides Program. The purpose of these meetings is 1) to discuss species habitats, range and other characteristics and pesticides that may impact the endangered species directly or indirectly and 2) to identify and discuss developing issues such as habitat identification, mapping and dissemination of information on new identified/listed species.

This activity will also include the review of habitat maps to ensure that they provide accurate descriptions of where endangered species must be protected and an on-going collection of information for map development and revision as well as information on pesticide use by county, region and state.

II. Additional Work Program Activities

A. Outline of MDA Endangered Species Protection Program

The department has developed an endangered species protection plan specific to the use of strychnine rodenticides for the control of ground squirrels in Montana. This plan was developed in consultation with the Montana office of the U. S. Fish and Wildlife Service so that endangered species concerns specific to the use of strychnine are included in the plan. The plan was submitted to EPA for review in March 1991. The proposed plan would modify product labels and provide for a supplemental bulletin. The product label modifications and supplemental bulletin would permit use of strychnine rodenticides while prohibiting use at certain times or in certain areas when or where endangered species may be adversely affected. The MDA is continuing to negotiate with EPA and the USFWS to attempt to get the plan approved.

WORKER PROTECTION PROGRAM - WORK PROGRAM ACTIVITIES

I. Work Program Requirements

A. Initial Outreach/Communication Effort

Within three to six months after the Worker Protection Standards (WPS) are published in the Federal Register, the MDA will reproduce and distribute informational materials which will be provided by the EPA Regional Program Office. These materials will be directed at employers, employee organizations, and other interested parties. The MDA will prepare a distribution list of employers and employee organizations that will receive the information when available from EPA.

II. Implementation Strategy

A. Submission Time Table/EPA Review

The strategy will be submitted by the MDA to the EPA Regional Office within eight months after the final WPS are published.

Within one month after receipt, the EPA Regional Office will provide the MDA with comments, if any. The MDA will address any comments within one month of their receipt and forward the revised implementation strategy to the EPA Regional Program Office.

B. Implementation Strategy Components

The Implementation Strategy will include at a minimum:

1. Outreach/Communication

The major focus of the worker protection program in FY 1993 is outreach. The development of an outreach/communication program as part of the implementation strategy is key to the success of the program. Office of Pesticide Programs (OPP) is developing outreach materials in the form of camera-ready copy and master video/slide programs that will be made available to states in a format for easy duplication and dissemination.

Initiate basic training and education of pesticide applicators and dealers on protection of workers handling pesticides or those workers who may be exposed post application.

Meetings between the Extension Service and the department have been held to discuss possible methods for implementing the worker protection regulations within three months of publication of the final rule.

Targeting key groups that may be impacted by the regulations is being discussed by the department, however, exact plans cannot be developed until the regulations are issued. The MDA will prepare a plan to notify constituents.

The department plans to attend EPA sponsored training on the worker protection rules when, and if, available.

2. Training

The EPA is developing national training/educational materials and guidance documents that will meet the requirements of the WPS. These materials will be made available to states in the form of camera-ready copy for written materials and masters for audio-visual materials. These materials are designed to promote consistent standards among state WPS programs and to avoid duplication of effort that would result if each state developed their own materials. A catalog of these materials will be forwarded to state agencies as soon as they are available.

3. Cooperative Relationships with Other Agencies.

Contact with federal and state OSHA agencies will be made to generally discuss their current programs and the pending EPA worker protection regulations and possible program requirements. More comprehensive discussions will be held once the final regulations are issued and evaluated by the department.

4. Compliance Monitoring Strategy

Discussions on an enforcement strategy will be held with the department technical and enforcement program personnel. The department plans to negotiate worker protection inspections with EPA as it develops the compliance monitoring plan.

C. Implementation Schedule

Within ten months of the publication date of the final revised WPS, at the latest, the MDA will begin putting its implementation strategies into effect.

The 10-month requirement is based on this calculation:

8 months MDA development of the implementation plan
+ 1 month Regional review and comment
+ 1 month MDA incorporates comments
10 months Total

SCHEDULING

The MDA schedule of the enforcement activities and the pesticide program activities and accomplishments planned for the grant period is located in the workplan.

REPORTING

I. Report Format

Reports will consist of a narrative summary of the activities and accomplishments during the reporting period. Projected accomplishments, updated schedules, and activities are reported according to the quarter in which they occurred (or will occur for the upcoming six month period). The reports will describe how the MDA has progressed in developing the program (implementation strategies, management plans, etc.) as well as how it has put its strategies and plans into effect and what has resulted. Each report will summarize the following elements:

A. Activities completed,

B. Goals and activities for the up-coming quarter,

C. An updated schedule for the up-coming quarter (noting any changes made from the original accomplishments schedule) and

D. Problems and proposed resolutions.

II. Certification and Training Program

The reports concerning the MDA program for certification and training of pesticide applicators are submitted semi-annually according to the specifications outlined in the Certification and Training Work program section and in the protocol for certification mid-year and end-of-year evaluations.

III. Program Initiatives

Reports on activities and accomplishments in the program initiative areas of worker protection, groundwater, and endangered species also are required at mid-year and end-of-year. These reports will be submitted by the MDA to the

EPA Regional Program Office within 30 calendar days following the completion of the second and fourth state fiscal year quarters.

Ground Water Protection Program

For ground water, the reports will address the following items:

- progress in conducting the Implementation Plan,
- current coordination activities with other State ground and surface water protection efforts,
- progress in assessing and identifying groundwater vulnerability,
- status of outreach activities,
- progress made in special projects, and
- information on utilization of funds to provide an indication of how well funding is being utilized.

Endangered Species Protection Program

For endangered species, the reports will address the following items:

- progress in developing and implementing an information response system,
- progress in compiling and disseminating information on Federally-listed endangered species,
- progress in developing and/or implementing State-initiated Plans,
- progress in piloting the Federal program,
- progress in review of maps,
- progress made in special projects and
- information on utilization of funds to provide an indication of how well funding is being utilized.

Worker Protection Program

For worker protection, the reports will address the following items:

- a critical review of the implementation strategy,

- a report on progress in establishing relationships with other State agencies,

- information on planned training sessions and plans and activities to develop and/or reproduce training materials,

- progress on special activities, and

- information on utilization of funds to provide an indication of how well funding is being utilized.

There are two additional topics where information is requested because of its usefulness to the Occupational Safety Branch in the Office of Pesticide Programs:

- information about the State's own worker protection program, State worker protection laws and regulations, and State developed materials and publications relating to worker protection, and

- information about the types of materials or other assistance from EPA Headquarters that would be most valuable to the State.

ACCOUNTING RECORDS AND FILING SYSTEMS

The MDA will maintain accounting records for funds awarded for each component, enforcement, certification and pesticide program activities under this agreement (including receipts, state matching contributions, and expenditures) in accordance with all applicable EPA grant regulations and generally accepted accounting principles.

Fiscal control and accounting procedures will be sufficient to:

- Track the expenditure of funds separately for the three components (enforcement, certification and pesticide program activities) of the consolidated pesticide agreement,

- Permit preparation of financial reports required by the regulations, and

- Permit the tracking of funds to a level of expenditures adequate to establish that such funds have not been used in violation of the restrictions and prohibitions of applicable statutes.

EVALUATION PLAN

Evaluation of the FY 1993 cooperative agreement by Region VIII personnel will be conducted at the mid-year meeting (January, 1993) and the end-of-year meeting (July, 1993).

ENFORCEMENT ACTIVITIES FOR FY 1993 WORK PROGRAM

I. FY 93 Initiatives

A. Worker Protection Enforcement Activities

1. Notification to Prospective Constituents

Between the publication date of the final rule and effective dates for compliance, the MDA will continue to use the opportunity of inspections conducted under the cooperative agreement to notify prospective constituents of the provisions of the final rule and to ensure compliance with current worker protection requirements. This will be in addition to other methods for notification used by Montana (outlined in the compliance communication strategy described below).

2. Compliance Monitoring Strategy

The State of Montana will submit to Region VIII a Compliance Monitoring Strategy for worker protection, with the components discussed below, within eight months of the publication of the final rule. The compliance Monitoring Strategy will be a section of the Worker Protection Implementation Strategy.

The state's strategy will be reviewed and commented on by the EPA Regional office. The region's review will focus on whether the state's strategy is consistent with the national strategy and whether the proposed strategy is appropriate, given the state's particular situation. The MDA will then address the region's comments, if any, and forward the revised strategy to the regional office.

At a minimum, the compliance monitoring strategy will include a compliance communication strategy, a description of interagency coordination and a targeting scheme as distinct components, as discussed below.

a. Compliance Communication Strategy

The compliance communication strategy for worker protection will describe the actions which the MDA will take using enforcement funds to communicate the enforceable provisions and effective dates of the worker protection rule.

The state will identify in the Compliance Communication Strategy the specific sectors of the regulated community that will be effected,

explaining how and when the MDA plans to inform each sector of the requirements of the revised rules. The MDA will also discuss with the region the extent and quality of the information gathered in this area, based on the information resources available.

The MDA will inform the regulated community of its responsibility to comply with the Worker Protection Rule. In addition to inspections, the approaches and actions to be taken to communicate the enforceable provisions of the final rule and to be supported with enforcement funds will be described in the compliance communication strategy.

b. Inter-Agency Coordination

In Montana, seven native American reservations may eventually develop pesticide programs and assume responsibility for enforcing worker protection standards. None of them have been granted primacy under FIFRA to conduct pesticide programs at this time. No agencies other than the MDA have jurisdiction for enforcing EPA worker protection standards for pesticides.

The MDA is the lead agency for enforcement and will develop a mechanism, if necessary, for coordination with other agencies. The MDA has no plan at this time to develop written agreements with individual tribes.

C. Targeting Scheme to Ensure Compliance with the Worker Protection Rule

The MDA will maintain a scheme specifically for targeting inspections to ensure compliance with the worker protection rule and labeling. Targeting will be implemented when the effective dates for compliance have passed. The dates will be specified in the final rule.

These inspections will be comprehensive, targeted specifically for when and where activities regulated by the worker protection rule are most likely to take place.

3. Implementation of Compliance Monitoring Strategy

Within eight months of the publication date of the final Revised Worker Protection Standards, the state will begin to implement the compliance communication strategy and interagency coordination components of

the state's compliance monitoring strategy. In the absence of an approved State Strategy, the State will follow the National Compliance Monitoring Strategy.

Once the effective dates for compliance with the Final Rule have passed, the targeting scheme will be implemented.

4. Inspectional Activity

   a. Conducting Inspections

      Once the compliance dates for the revised worker protection rule have passed, the MDA pesticide inspection activities will include monitoring for compliance with the new worker protection labeling requirements. Monitoring for compliance with worker protection requirements shall be another element of comprehensive inspections.

   b. Incident and Complaint Investigations

      Montana will also conduct investigations in response to incident and complaint reports.

   c. Tracking

      The EPA will track Section 26 and 27 referrals; the MDA will track tips and complaints, not referred by EPA, that result in inspections.

5. Training

   Using funds received for worker protection enforcement, Montana will send appropriate personnel to available EPA-sponsored training sessions on the new Worker Protection Rule, provided that Montana can obtain approval for employees to travel out-of-state.

6. Reporting

   The state will specifically report on the implementation of their compliance monitoring strategy and the other worker protection enforcement activities described in this section. Two reporting mechanisms will be used to document the state's worker protection compliance monitoring activity:

   a. Evaluation Reports

      The regions will document Montana's worker protection compliance efforts as part of the mid-year and end-of-year evaluation reports.

b. Quarterly Accomplishments

The second mechanism will be through the quarterly reporting mechanism. Following the effective dates for compliance, the state's inspections performed under the cooperative agreement will include monitoring for compliance with the worker protection rule (export, certified applicators records and dealer inspections will not be applicable). If monitoring for worker protection requirements was not included as part of every remaining type of inspection, the MDA will explain why in the narrative section of the quarterly report.

B. Planning Enforcement Activities for Residue Removal Regulations

In preparation for enforcement of regulations promulgated under Section 19(f), FIFRA, Montana will plan for enforcement activities which will ensure compliance with these regulations. The MDA will submit an outline of proposed activities planned to ensure compliance with these regulations. This outline will be prepared by June 30, 1993, if the federal regulations are proposed or if the national enforcement guidance is received.

C. Enforcement Activities for Groundwater Protection

1. In FY 1993, the MDA will continue to monitor compliance with and enforce labeling as part of use, producing establishment, marketplace, and dealer inspections.

   In targeting use inspections, the state will take into account areas of high risk for groundwater contamination, along with how these areas overlap with locations of pesticide use.

   Montana will document inspections that address compliance monitoring for ground water related requirements, and will document these in quarterly reports.

2. The MDA will continue to identify, and describe enforcement authorities, capabilities, and activities, which will be used to assure compliance with the provisions of the state's groundwater management plan. A clear statement of the roles of different agencies will be included in the General Management Plan now being written by Montana and planned for completion during FY 1993.

3. The MDA will consider the enforcement authorities available under other federal/state statutes, when it comes to contamination of ground water or drinking water supplies, and coordinate enforcement activities with EPA and other state agencies, as appropriate, to make full use of other statutes where applicable.

4. The state will implement the aforementioned enforcement activities.

D. Enforcement Activities for Endangered Species Protection

1. Enforcement of the use limitations to be imposed to protect listed species will be carried out under the provision of FIFRA addressing misbranding and misuse. Products whose use requires limitations to protect listed species and which do not carry the necessary information on the product labeling, may be identified through routine inspections of manufacturing facilities and pesticide distributors and dealers or through information received regarding suspected misbranding. Products found to be misbranded (i.e., do not carry the required label language to protect listed species) may be subject to enforcement action. In the field, pesticide misuse will be identified similarly through routine inspection and information provided regarding alleged misuse of a pesticide product.

In targeting use inspections, the MDA will take into account areas inhabited by endangered species, along with how these areas overlap with locations of pesticide use.

2. Once the final Endangered Species Protection Program is published by the agency, the state will plan for and implement appropriate enforcement measures. The MDA will comply with the National Compliance Monitoring Strategy for the Endangered Species Protection Program.

E. Exports

In FY 1993, the state will conduct pesticide export inspections, as indicated on the Pesticide Media Work plan. Specific information provided by OCM will be considered for targeting facilities and compliance monitoring strategy.

F. Disinfectant Efficacy Testing Activities

The State of Montana has the resources for collection of disinfectant samples for efficacy testing. Any commitment to collect such samples should be consistent with, or reflected by adjustments to the media work plan.

II. Core Enforcement Work Program Activities

A. Cancellations, Suspensions and other Major Regulatory Actions

The State of Montana will conduct cancellation/suspension inspections and other compliance monitoring activities to assure compliance with major pesticide regulatory actions within the time frames specified in the nationally issued Compliance Monitoring Strategies. Inspections and other compliance monitoring activities for this priority area will address:

1. Major cancellation actions,

2. All suspensions under FIFRA Section 6,

3. FIFRA Section 3(c) (2) (B) suspensions and

4. Other major pesticide regulatory actions (i.e. label improvement programs, etc.).

The state will track state and federal program inspections, violations found and enforcement actions taken in follow-up to cancellations and suspensions. Narrative reports will be prepared on the inspections and enforcement actions taken as specified in the applicable compliance monitoring strategies. EPA form 5700-33H will be used to document compliance monitoring of cancellations and suspensions as a component of comprehensive inspections.

B. Section 6(g) Information Submittal and Pesticide Recalls

The State of Montana will help enforce the information submittal requirements under Section 6(g), FIFRA. The State of Montana will consider the information which is received on quantities and locations of suspended or canceled pesticides in targeting future inspections. Montana will also enforce recall of suspended and canceled pesticides when applicable.

The State of Montana will track the disposition of stored canceled and suspended products reported under Section 6(g), FIFRA. The State will undertake inspections and appropriate compliance actions with regard to these

products taking into consideration state and federal pesticide laws, cancellation/suspension regulations, compliance strategies, and RCRA requirements.

The State of Montana will also enforce pesticide recalls where applicable. The State will wish to consult with the regional office regarding the priorities of recall actions relative to other activities being conducted by the State.

C. Priority-Setting

A copy of the MDA's priority setting plan was included in the 1991 application. This plan has not been amended; however, priorities were updated for FY 1993.

Following are Enforcement Program Priorities for FY 1993 as identified by MDA field and administrative staff and the EPA:

1. Priorities Identified by Field Services Bureau Pesticide Specialists (listed in order of priority):

   a. Develop consistency in pesticide records inspections including those for seed treaters,

   b. Conduct initial records and use inspections of newly licensed applicators and dealers,

   c. Provide inspector training on conducting interviews and writing reports,

   d. Conduct inspections of the regulated community on a 3 - 4 year cycle,

   e. Conduct repeat inspections to assure that documented past violations are corrected,

   f. Inspect applicators licensed in ornamental and turf pest control, particularly those from out-of-state,

   g. Continue to investigate misuse of insecticides for predator control and

   h. Continue to investigate potential contamination of surface and ground water, particularly that involving pesticides with longer residuals.

2. Enforcement Program Priorities Identified by MDA Administrative Staff (not listed in order of priority)

a. Begin revising the Field Services Bureau Quality Assurance Program and standard operating procedures for sampling, inspections, safety, investigations and other subjects,

b. Provide bureau framework for conducting routine inspections of each member of the regulated community at no less than four year intervals,

c. Continue to investigate legitimate complaints of pesticide misuse, damage, violations and incidents; incorporate an evaluation that will prioritize and help identify an appropriate response to each potential investigation,

d. Finalize development of and test a tracking system for managing inspections, samples, enforcement actions, affected environments, compliance histories, etc.,

e. Develop and implement core training for bureau staff in cooperation with EPA; such training to address inspection and investigation procedures, safety, sampling, pesticide use, etc.,

f. Prepare to implement new regulations for residue removal being developed to implement Section 19, FIFRA,

g. Conduct a pilot project to assess residues remaining in triple rinsed containers, and assist industry in testing the feasibility for pesticide container recycling; and

h. Develop and issue through the Montana Administrative Procedures Process rules for disposal of pesticide containers.

3. Implement the national enforcement priorities identified by EPA which is to implement six initiatives. These initiatives are (a) worker protection, (b) residue removal, (c) ground water protection, (d) endangered species protection, (e) exports, and (f) disinfectants.

D. Inspection and Sample Collection Activities

The outputs which the MDA proposes to accomplish during the agreement period are outlined in the inspection media work plan. The criteria that were used in defining these outputs included (1) state and federal priorities, and (2) the structure of the regulated community in Montana.

1. Categories of Inspections

Inspections will be conducted in accordance with the procedures set forth in the updated Pesticides Inspectors Manual. The categories of inspections and investigations to be conducted include:

a. Agricultural use,

b. Non-agricultural use,

c. Experimental use,

d. Producer establishments,

e. Market place,

f. Imports,

g. Exports,

h. Certified applicator records and

i. Restricted use pesticide dealer.

Federal facility inspections will be a subset of these.

2. Federal Facility Inspections

The MDA will incorporate inspections of federal facilities into the plan for routine inspections so that federal facilities are inspected on the same rotation as other pesticide facilities. The MDA will evaluate all pesticide complaints involving federal facilities, and will conduct follow-up inspections where violations of state or federal laws are suspected.

3. Comprehensive Inspections

The MDA will conduct comprehensive inspections, addressing every element of each type of inspection where possible and feasible. Inspections will check for canceled or suspended products, child resistant packaging, and labeling or other requirements affecting ground water, endangered species and worker protection.

4. Strategies

The MDA will follow requirements related to inspections which are included in National Compliance Monitoring Strategies.

Narrative reports will continue to be prepared on the inspections and enforcement actions taken as specified in the applicable compliance monitoring strategies.

5. EPA form 5700-33H

EPA form 5700-33H will be completed and include projections for the categories of inspections listed on the form.

6. Documentation of Inspections

Inspections will be conducted in accordance with the procedures set forth in the updated EPA Pesticides Inspection Manual.

The MDA will ensure proper documentation of inspections (affidavits, maps, photos, etc.).

7. Inspection Reports

Copies of all inspectional reports will be retained by the MDA for a reasonable period of time, but at least until any associated enforcement cases are resolved and closed. These reports will be available for examination by EPA.

8. Producer Establishment Inspections

A number of routine producer establishment inspections will be completed so that all producer establishments are inspected over time on a routine basis.

IV. Quality Assurance

A. Quality Assurance Project Plan

The State of Montana submitted an updated Quality Assurance Project Plan to EPA for review and approval in 1991.

In FY 1993 enforcement activities will be conducted using the Quality Assurance Project Plan currently approved by EPA. A MDA enforcement priority will be to continue to update standard operating procedures for field sampling activities to assure that collection and submission of samples is consistent with the laboratory QA/QC. Montana will also monitor the progress of other states involved in national efforts aimed at development of a standard QA/QC/SOP.

B. Analytical Methods

Pesticide formulation samples collected for determination of product compliance shall be analyzed by the MDA laboratory, using the EPA Manual of Chemical Methods for Pesticides and Devices, Association of Official Analytical Chemists (AOAC) Analytical Manual (14th Ed.), the Collaborative International Pesticide Analytical Council Manual (CIPAC), or other standard analytical methods. All potentially volatile samples shall be verified by procedures spelled out in the NEIC Pesticide Products Procedures Manual or as otherwise specified in the Quality Assurance Project Plan.

Pesticide residue samples in support of misuse investigations shall also be analyzed by the MDA laboratory, using available FDA, EPA, USGS or other accepted methods available in the scientific literature or by the pesticide industry. All reported results will be accompanied by appropriate quality control parameters so as to allow evaluation of precision, accuracy, freedom from interferences and confirmation of pesticide (or metabolite) identity.

C. Cross Contamination Screening

The MDA shall establish and utilize a cross contamination screening program for pesticide formulations in accordance with the EPA Cross Contamination Guidelines.

D. Check Sample Program

The MDA shall participate in the EPA's National Enforcement Investigations Center (NEIC) Check Sample Program. The MDA will submit a report indicating the methodology used and the results of the analyses to EPA.

If the state fails to obtain the correct results, EPA and the MDA will reach agreement on appropriate follow-up activities.

E. Back-up Analysis Procedure

The MDA may request back-up analyses from NEIC or other NEIC recommended laboratories, if necessary or requested by the Region.

F. Training of Analytical Chemists and State Investigators

EPA will provide training of state inspectors and analytical chemist, as necessary. Using cooperative agreement or other funds, the state will avail itself of EPA workshops, seminars and meetings on proper sampling,

analytical procedures, instrumentation, methodology and quality assurance.

G. Laboratory Reviews

The MDA shall allow EPA representatives to conduct on-site laboratory visits to review state laboratory analytical capability and procedures, and to discuss areas needing improvement.

H. Provision of Analysis Results

The MDA shall send a copy of the results of any sample analysis made under the authority of FIFRA to that person from whom the sample was collected.

I. Submission/Retention of Reports

Copies of all analytical reports, associated raw data and other necessary records for samples collected shall be retained by the state and be available for examination by EPA, or be forwarded to the EPA Regional Office.

The analytical reports will be retained by MDA or the EPA Regional Office until the associated enforcement cases are resolved and closed out.

V. Formal Referrals

The state will conduct activities under FIFRA Section 26 and 27. Section 27(a) of FIFRA requires EPA to refer to the states any information the Agency receives indicating a significant violation of pesticide use laws. All pesticide use cases, identified as significant, will be referred to the MDA by EPA in writing, and will be formally tracked as set forth in the Final Interpretive Rule.

The MDA will commence appropriate enforcement action for cases, so tracked, within 30 days after completion of the investigation. This period may be extended, after negotiation, if required by the procedural characteristics of the state regulatory structure or the complexity of the case.

If the state has not reported on the investigative status within 30 days of the date of referral, EPA will contact the state to learn the results of the investigation and the state's intended enforcement response to any violations detected. An investigation should be considered adequate if the state has: (1) followed proper sampling and other evidence gathering techniques; (2) responded expeditiously to the referral; and (3) documented all inculpatory or exculpatory events or information.

If the region determines that the state's intended enforcement response to the violation is inappropriate, EPA will first attempt to negotiate an appropriate state enforcement response. If the state is unwilling or unable to alter its original enforcement response, EPA may bring its own enforcement action after notice to the state. That notice will summarize the facts relating to the state's enforcement response, discuss reasons for EPA's determination that the enforcement action is inadequate and state that EPA will initiate its own enforcement action. The Region will not initiate an enforcement action sooner than thirty (30) days after the state was notified.

VI. Enforcement Response, Case Development and Tracking Activities

A. Enforcement Response Policy

Montana submitted an updated Enforcement Response Policy (ERP) to EPA in FY 1990. The ERP has not been modified and will be followed during the project period of this cooperative agreement. The ERP will be updated and corrected to keep current with changes in the enforcement program and to correct any inaccuracies found in it.

In determining enforcement penalties and/or in negotiating settlement agreements, the State of Montana will consider potential pollution prevention activities which a violator could undertake in exchange for an appropriate reduction in the enforcement penalty where applicable.

B. Case Development

The review of all inspection reports for the detection of possible violations and the initiation of appropriate enforcement action is an important part of every comprehensive pesticide enforcement program. The MDA will review the quality and adequacy of evidence gathered during the course of all investigatory activities performed under the cooperative agreement.

1. Violations of Montana's Law Only

The state will review the quality and sufficiency of evidence gathered in the course of all investigative activities performed under the cooperative agreement. If the evidence reveals a violation of only Montana's pesticide statutes, the MDA will pursue an appropriate remedy provided by state law.

2. Violations of Federal Law Only

Where evidence reveals a possible violation of federal law only, the state will forward the information to the EPA Regional Office within 30 days after completion of the investigation. All cases forwarded to EPA will include all evidence, inspection reports and/or forms, a brief narrative of the case, and a recommended enforcement response.

The MDA will prepare and make available to EPA, when requested, testimony and other evidence pursuant to the procedures adopted by EPA. The MDA will provide witnesses for informal settlement conferences, public hearings, and appearances in a court of law, as the EPA requests.

3. Violation of Both Montana and Federal Law

If evidence reveals a violation of both state and federal law, the MDA may bring appropriate enforcement action under state law or refer the case to EPA for action under FIFRA.

The MDA will follow procedures outlined in the FY 1991 Grant Guidance in investigating and forwarding cases to EPA where violations of federal law are revealed that are not also violations of state law.

For all pesticide cases, for which the MDA determines that the most appropriate enforcement action is not available under state law, the MDA may refer such cases to EPA for enforcement action under FIFRA.

C. Cross Jurisdictional Situations

The MDA will continue to provide technical and program assistance to tribes on pesticides, pests, enforcement, certification, and new program activities. Such assistance will include training, certification of applicators, investigation of misuse or improper sales, and information on new EPA initiatives, plans and strategies.

VII. Tracking

The MDA currently maintains enforcement information on dBase IV databases. The MDA will continue to develop improved databases, data entry procedures, and reporting in FY 1993.

The MDA will utilize its management system for tracking all inspections, violations found, and enforcement actions initiated. The tracking system will, at minimum, include the following elements:

A. The date of inspection,

B. The reason for inspection (routine, complaint),

C. The name of the person or firm inspected,

D. The violation found,

E. The summary of past compliance history,

F. The enforcement action taken,

G. The date of enforcement actions and

H. The disposition of the action.

Under the aforementioned tracking system or separate system, the MDA will document and track the inspections, violations found and enforcement actions taken in follow-up to cancellations and suspensions of pesticides. Reports will be prepared on the inspections and enforcement actions taken after the suspensions and cancellations as specified in the applicable compliance monitoring strategies.

VIII. Reporting

The MDA will use EPA Form 5700-33H for reporting the required comprehensive inspection and sample collection accomplishments under the FIFRA Enforcement Cooperative Agreement. A narrative report may need to accompany the reporting form to discuss any pertinent state enforcement activities not addressed on the form, any program highlights and/or any program problem areas.

Completed compliance monitoring reporting forms will be submitted quarterly. These reports showing inspectional activities and enforcement actions accomplished shall be submitted by the state to the EPA Regional Office within 30 calendar days following the completion of each state fiscal year quarter. Quarterly reports will be submitted by October 30, January 30, May 30 and July 30 of each year in accordance with the state fiscal year.

Reports will be prepared on inspections and enforcement actions taken after "major pesticide regulatory actions" as specified in the applicable compliance monitoring strategy.

IX. Evaluation Plan

Evaluation of the enforcement work program will be conducted in January and July within 30 days of the FY 1993 mid-year and year-end.

X. Unresolved Problems

To address the need for an additional employee to conduct case review and staff training, the MDA hired an additional staff member on March 23, 1992.

The MDA also addressed the need for upgrading salaries of inspectors. In April 1992 pesticide inspectors were reclassified as Agricultural Specialists and pay grades were raised from Grade 12 to Grade 14.

The Laboratory Bureau has implemented a procedure for counting laboratory samples. This procedure will account for all samples including quality assurance program samples analyzed by the laboratory and will provide a satisfactory method for the laboratory to track samples. Samples collected in the field continue to be counted as field samples.

XI. EPA Support to the MDA

A. Inspector Training

The EPA will coordinate the basic training needed to qualify inspectors to properly conduct comprehensive inspections, collect samples, collect evidence; prepare inspection reports, and other components of an enforcement program. EPA will notify the MDA of any Basic Inspector Training in Regions VIII or X.

B. Safety Training

The MDA feels that pesticide inspectors will respond to incidents involving hazardous substances and therefore, should have training that meets U.S. Occupation Safety and Health Administrations requirement of a minimum of 40 hours of training for hazardous site workers (29 CFR 1910.120). The EPA will inform the MDA of any training and training updates that meet this requirement in Regions VIII or X.

C. Federal Credentials

The EPA will provide federal credentials to newly hired MDA enforcement staff within a reasonable time after receiving a request from the MDA. The MDA will include a suitable photo in its request for each federal credential.

D. Training for EPA Initiatives and Compliance Monitoring Strategies

The EPA will provide enforcement procedures training for new EPA initiatives and compliance monitoring strategies

(worker protection, groundwater, residue removal, endangered species, information submitted under Section 6(g), FIFRA, lawn care activities).

Contact Persons:

Agricultural and Biological Sciences Division, MDA 444-2944
Gary Gingery - Administrator
Laszlo Torma - Laboratory Bureau Chief
Steve Baril - Field Services Bureau Chief
George Algard - Technical Services Bureau Chief

Montana EPA Office 449-5486
Jay Sinnott - Environmental Engineer
Eric Finke - Chief, Air, Hazardous Wastes and Toxic Branch

Certification

The plan to update the department's certification program to meet the revised regulations for 40 CFR Part 171 is essentially on hold. The final regulations have not been published and any changes to the existing program cannot be made until these are available. The funding for this project ($37,874) was for a 2 year period beginning Oct.1, 1991 and was to be used to modify the department's computer certification system and to hire a 1/2 time clerk to perform the data entry and prepare revised application forms and documents. No funds have been expended as of May 30, 1992.

Ground Water Program

GIS System

The department has let bids for the purchase of a computer and for the ARC/INFO software to run the program. Minor equipment such as a table and chair have been purchased.

The department has purchased an electronic water level indicator and a nitrate meter at a cost of $600. The department anticipates expenditure of the $50,600 budget.

Pesticide Disposal/Ground Water Plan

The project to develop a plan for disposal of pesticides and pesticide containers and for the establishment of mixing/loading site standards in Montana has begun. The 1/2 time clerk was hired June 1, 1992 and the Agricultural Specialist position has been advertised but has not yet been filled. A total of $1,953 has been expended as of May 30, 1992.

Enforcement Workshop For SLA's and Laboratory Directors

The department in cooperation with the EPA conducted a meeting for State Lead Agency Enforcement Personnel and Laboratory Directors. The meeting was held in Bozeman, Montana on February 5-7, 1992. The purpose of the meeting was to provide the opportunity for enforcement and laboratory personnel from states, tribes and EPA to present pesticide program issues of common interest and to create a forum for discussing these issues. The meeting was attended by 54 persons representing states, tribes, and EPA from Regions VIII and X. EPA special project funds paid meeting costs and transportation costs for attendees.

Prior to the meeting, the department contacted pesticide laboratory and SLA personnel in Regions VIII and X and asked for issues. Issues received were incorporated into the agenda.

Training for chemists and field personnel and the development of QA/QC/SOP documents for laboratory and field activities were two key issues that were identified as needing further attention. Other laboratory issues included needs for analytical methodology and standards, budget needs and planning, and funds for laboratory equipment. Important field issues included prioritizing enforcement issues, development of tracking capabilities, addressing mixing loading site problems, and resource needs to implement new EPA initiatives. A general consensus from the meeting was that good communication between laboratory and SLA personnel was important and that agencies need to foster this communication. The department expended $7,996 of the $20,000 allocated for this project.

Quality Assurance Plan

Preparation of the Model Quality Assurance Project Plan (QAPP) for the Pesticide Cooperative Agreement was implemented in FY 92. A SFIREG Issue Paper recommended that the Technical Oversight Committee have representation from EPA Headquarters, EPA Regional QA officers, EPA/NEIC, State Pesticide Laboratories and State Lead Agencies. The initial document for the Montana Department of Agriculture's QAPP was reviewed by the Committee in Albuquerque, NM. Numerous conference calls were also held to incorporate suggestions from the Technical Oversight Committee members. A writer and an editor was hired to assist in finalizing the document.

After considering suggestions and agreements from the Oversight Committee, the document was rewritten and a "final draft" copy was submitted to the committee members for review and comments. These comments were discussed with Dean Hill/NEIC for advice and recommendations. The draft copy with corrections was submitted to the editor to be revised in final form. The edited copy of the QAPP will be submitted to Linda Flick of EPA for final review and distribution as part of the Grant Guidance. Most of the $7,000 budget has been committed at this time.

Montana Farm-A-Syst Program

The Farm-A-Syst program was developed as a cooperative effort among a large number of midwestern agencies to assist farmers and rural residents in the use of systematic techniques to voluntarily assess water well contamination risks at their farmstead. It is a proven, effective method of helping users to increase their ability to recognize water pollution risks. It also encourages and facilitates taking appropriate actions to reduce and prevent pollution or to correct problems identified by this system.

The Montana State University Extension Service proposes to revise the Farm-A-Syst program developed by the USDA Extension Service, Soil Conservation Service and the US EPA so that it will be suitable for use in the western region of the United States.

The Montana Farm-A-Syst Program will reflect any changes in agricultural practices directed by the 1992 reauthorization of the Clean Water Act as well as the considerable differences between Montana Water Law and Wisconsin Water Law for which the program was developed. Therefore, the Montana Farm-A-Syst program will serve as a model for revision and adoption by other western states.

The Montana Farm-A-Syst Program will facilitate this process by presenting workshops in Colorado, Wyoming, North Dakota, South Dakota, and Utah, to interested audiences such as personnel from the Soil Conservation Service, Conservation Districts, and Extension Services, Health Departments, and farm organizations, along with agricultural science teachers, water well contractors and others.

The Montana Farm-A-Syst Program will be developed by the MSU Extension Service, MSU Plant and Soil Science Department and the Montana Department of Agriculture, with cooperation and assistance from the Montana Soil Conservation Service, the Montana Department of Health and Environmental Sciences, the Montana Department of Natural Resources and Conservation, the Montana Office of EPA Region VIII and the Montana Board of Water Well Contractors. The program will be developed and implemented on a two year schedule. The estimated budget for this project is $118,343 ($100,042 EPA and $18,301 state).

SFY 93
PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE: THROUGH MIDYEAR	MILESTONE: THROUGH END OF YEAR	RESOURCES: WORKYEARS STATE	RESOURCES: WORKYEARS EPA	RESOURCES: DOLLARS STATE	RESOURCES: DOLLARS EPA	RESPONSIBLE AGENCY
I. ENFORCEMENT PROGRAM							
A. Agricultural Use Inspections	16	35	.39		2,339	13,255	MDA
B. Agricultural Follow-up Inspections	15	30	.33		1,979	11,215	MDA
C. Non-agricultural Use Inspections	10	20	.17		1,020	5,778	MDA
D. Non-agricultural Follow-up Inspections	7	15	.17		1,020	5,778	MDA
E. Experimental Use Inspections	1	2	.02		120	680	MDA
F. Producer Establishment Inspections	7	15	.12		720	4,078	MDA
G. Marketplace Inspections	20	40	.11		660	3,738	MDA
H. Import/Export Inspections	0	1	.01		60	340	MDA
I. Certified Applicator Records Inspection	25	55	.15		899	5,098	MDA
J. Restricted Use Sales-Pest. Dealer Insp.	20	40	.11		660	3,738	MDA
K. Samples taken in the field	58	116	.32		1,919	10,876	MDA
L. Laboratory Formulation Samples *	10	10	.08		297	1,682	MDA
M. Laboratory Residue Samples *	145	300	4.14		15,360	87,041	MDA
N. EPA Pesticide Samples *	37	75	1.08		7,057	39,988	MDA
O. Administrative Support	---	---	0.89		4,339	24,587	
		SUBTOTAL	8.09		$38,449	$217,872	

* Includes Quality Control Analysis

SFY 93
PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE		RESOURCES				RESPONSIBLE AGENCY
	THROUGH MIDYEAR	THROUGH END OF YEAR	WORKYEARS STATE	WORKYEARS EPA	DOLLARS STATE	DOLLARS EPA	
II. SPECIAL ENFORCEMENT							
A. Worker Protection Compliance Strategy			.70		5,382	30,500	MDA
B. 1) Finalize and Test the Enforcement Tracking System (0.1 FTE), 2) Update Quality Assurance and SOP for Pesticide Enforcement Field Activities (0.35 FTE), 3) Develop SOP's for Ground Water Activities (0.1 FTE).		SUBTOTAL	0.55	*	*	*	MDA
			1.25		$ 5,382	$ 30,500	
* These activities will be accomplished using state funds and some federal funds. Federal funds will be used for enforcement.							
III. CERTIFICATION PROGRAM							
A. Issue Certification Credentials		5,000	1.28		33,295	33,295	MDA
B. Monitor Certification Program			.40		10,514	10,514	MDA
		SUBTOTAL	1.68		$ 43,809	$ 43,809	
IV. DEVELOPMENT PROGRAMS							
A. Worker Protection			.52		3,671	20,800	MDA
B. Endangered Species			.07		882	5,000	MDA
C. Ground Water			1.02		13,378	75,810	MDA
		SUBTOTAL	1.61		$ 17,931	$101,610	

SFY 93
PESTICIDE MEDIA WORK PLAN

ACTIVITY/OUTPUT	MILESTONE THROUGH MIDYEAR	MILESTONE THROUGH END OF YEAR	RESOURCES WORKYEARS STATE	WORKYEARS EPA	DOLLARS STATE	DOLLARS EPA	RESPONSIBLE AGENCY
V. SPECIAL PROJECTS							
A. Special Laboratory Equipment			-0-		-0-	12,000	MDA
B. Montana Farm-A-Syst Program (Special Project with MSU)			1.08		17,663	100,092	MDA & MSU
C. Ground Water Pesticide Disposal (Special 2 yr project started 10/1/91)							MDA
D. Certification Revision (Special 2 yr project funded 10/1/91)							MDA
		SUBTOTAL	1.08		$ 17,663	$112,092	
VI. REPORTS							
Submit Summaries of Enforcement and Certification Data within 30 days of the end of each quarter.	Quarterly	Quarterly	.50		----	----	MDA
VII. EPA OVERSIGHT (Includes technical assistance, mid-year and annual evaluation, grant support, Section 18 and 24(c) support, etc.)				0.50	----	----	EPA
		TOTAL	15.29	0.50	$123,234	$505,883	

AIR

The Big Sky Country is truly what its name implies, yet there are places where the quality of air is a fragile resource. The plains east of the Rocky Mountains provide few obstructions to the sea of air that flows across the land, but in western, southern and central Montana, where various mountain ranges form valleys, air sometimes is trapped in layered inversions, causing degradation.

In addition to inversions and natural sources of contamination, man also plays a part in altering air quality. In urban areas throughout the state, street dust, smoke from wood stoves and industrial emissions contribute to lowering air quality and visibility. In rural areas the largest contributors to air quality degradation include unpaved roads and open burning.

Montana's air quality program can be divided into four parts: permits, inspections and enforcement, implementation plans and air quality surveillance. The combination of these activities provides for a coordinated and comprehensive program of monitoring, problem prevention, problem correction and enforcement.

In order to prevent future air quality problems, Montana relies primarily on its permitting program. This program requires that all significant sources of air pollution must obtain a permit prior to construction. Montana requires a permit for any source which has the potential to emit more than 25 tons per year of any air pollutant (except lead - 5 tons/year). To augment this program and to provide national consistency, Montana has also adopted the federally mandated Prevention of Significant Deterioration (PSD) rules. This program has EPA approval and operates in lieu of the federal program. The DHES is also proceeding with the development of an operating permit program, with associated permit fees, to meet requirements in the Federal Clean Air Act Amendments (CAAA) of 1990. A small Business Assistance Program to facilitate small business compliance with the CAAA is also being prepared.

One of the most difficult areas in air pollution control is to bring areas which exceed ambient air quality standards into compliance. This is usually accomplished by the development of plans for each area not in compliance with the standard. The sum of all of these plans, permit rules, emission standards, etc. is known as the State Implementation Plan (SIP). Montana submitted a SIP revision to incorporate the federal ten micron (PM-10) particulate standards in FY 1988. Area specific SIPs for each PM-10 nonattainment area are being developed and a number have been submitted to the EPA. Since Montana has 11% of the nation's PM-10 problem areas, the SIP development process requires a significant commitment of resources. In addition, Montana must revise the existing Carbon Monoxide (CO) SIP in Missoula to meet

CAAA requirements (ie, implementation of an oxygenated fuels program). In October 1988, the EPA notified the state that the East Helena Lead SIP was substantially inadequate to achieve ambient air lead standards. The CAAA also require the East Helena sulfur dioxide (SO_2) SIP to be updated and revised to meet new federal guidelines. During FY 1993, the department will be working to finalize PM-10 SIPs and to revise CO, SO_2 and lead SIPs. It should be noted that development of new and revised implementation plans for these areas is an immense effort which requires public input and has a significant impact on Montana communities and industries. The EPA has also notified the DHES that some portions of the overall Montana SIP may be deficient and will require update and revisions.

Ambient air quality monitoring is also an important part of any air quality program. Montana operates more than 100 samplers throughout the state in order to adequately assess the air quality of the state. Significant efforts will continue to be focused on meeting PM-10 and other nonattainment area monitoring requirements; however, because of resource limitations monitoring objectives will be prioritized. Montana's monitoring program requires the collection of high quality data and it is committed to using the EPA quality assurance criteria as a minimum. The monitoring network typically generates 17,000 laboratory analyses, 4,000 samples, and 180,000 hourly field values per year.

As a means of determining compliance with emission standards at industrial facilities, the DHES conducts a regularly scheduled inspection program. If violations are found, then further enforcement action may follow. The options for enforcement include: requests for voluntary compliance, office conferences, hearings before the Board of Health and Environmental Sciences, Notice of Violation and Order to Take Corrective Action, and civil or criminal penalties. The follow-up enforcement for each violation is case-by-case, but follows the State/EPA Enforcement Agreement. The department has made significant progress in its Air Enforcement Program, and it expects to continue in FY 1993.

A significant factor in the growth and activities affecting Montana's Air Quality Program is the passage of the CAAA of 1990. These amendments will have far reaching impacts on the nation and on Montana. Some of the areas addressed in the new laws include nonattainment area planning, operating permit requirements, air toxics control and expanded enforcement authority.

In summary, Montana's air program will continue to focus on SIP development and on implementation of the CAAA requirements. Certain other programs may receive a lower priority to support SIP work; however, core programs (i.e., permitting, inspections and enforcement, monitoring) will be continued to assure a viable air program. The FY 1993 Air Quality Media Work Plan continues to attempt to balance the resources in Montana's Air Program with the objectives and milestones that the EPA would like to be

achieved. Of course, those activities needed to meet statutory mandates will continue to receive the highest priority.

Contact Persons:

Air Quality Bureau, DHES (444-3454)
Jeff Chaffee, Chief
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Harry Keltz, Supervisor, Compliance and Enforcement
Stan Sternberg, Supervisor, Operations
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EPA Montana Office (449-5486)
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Kris Knutson, Environmental Scientist

SFY 93
MONTANA STATE/EPA AGREEMENT

AQB Draft
9/14/92

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
SIP DEVELOPMENT					
A. CO		1.1	72,626		
1. Submit final oxygenated fuels program for Missoula	11/15/92			STATE	
2. Submit final, quality assured 1990 emission inventory for Missoula nonattainment area	11/15/92			STATE	
3. Submit revised SIP conformity procedures within one year of EPA final conformity rule for all nonattainment areas, and for attainment areas if required by EPA rule. Participate in conformity determinations for transportation and non-transportation actions as necessary	As required			STATE	
4. Continue implementation of existing CO SIP control measures per the savings clause of the 1990 Clean Air Act Amendments	Ongoing			STATE	
5. Develop and submit CO SIP RFP report as required by Clean Air Act Amendments	9/30/92			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
B. PM-10		1.7	112,240		
1. Address any deficiencies in the Butte, Columbia Falls, Kalispell, Libby, and Missoula PM-10 SIPs	Ongoing			STATE	This is a significant project since it involves adoption of contingency regulations, dispersion modeling of point sources, revised demonstrations of attainment, effectiveness surveys and potentially complete SIP revisions.
2. Finalize nonattainment designation for Thompson Falls	8/31/92			EPA	
3. Finish completeness review of submitted PM-10 SIPs	60 days from SIP submittal			EPA	
4. Propose approval/disapproval of initial nonattainment area SIPs	6 months from completeness determination			EPA	
5. Issue final approval/disapproval of initial nonattainment area SIPs	6 months from proposed rulemaking			EPA	
6. Develop PM-10 SIP for Thompson Falls (including provisions for contingency measures and nonattainment NSR)					
a. Complete CMB sample analysis, including all high concentration filters, and submit report to EPA for review	5/92				Completed

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
b. Submit final draft of emission inventory	7/92				
c. Submit draft SIP to EPA for review	11/92				
d. Submit final SIP to EPA	18 months from final nonattainment designation				
7. Finalize nonattainment designation for Whitefish				EPA	
8. Develop PM-10 SIP for Whitefish (including provisions for contingency measures and nonattainment NSR)					
a. Finalize general SIP development protocol	8/15/92			STATE/EPA	
b. Finalize detailed protocols for the CMB, dispersion modeling and emission inventory studies	9/15/92			STATE	
c. Establish Whitefish advisory comm.	9/15/92			STATE	
d. Define nonattainment boundaries	10/15/92			STATE/EPA	
e. Complete preliminary dispersion modeling (Phase I)	11/15/92			STATE	
f. Initiate CMB ambient monitoring	1/1/93			STATE	
NOTE: Remaining Whitefish PM-10 SIP activities will extend into FY94.					
9. Perform a comprehensive CMB analyses in each PM-10 nonattainment area which remains in violation in the applicable attainment year					No action in FY 93 anticipated.
10. Provide guidance on PM-10 NSR, redesignation, maintenance, BACM	Ongoing			EPA	
11. Provide technical assistance on all aspects of PM-10 SIP development	Ongoing			EPA	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
C. Lead - East Helena		1.5[2]	99,035		
1. Continue ambient lead monitoring around primary smelter.	Ongoing			STATE	
2. Continue meteorological monitoring around primary smelter.	Ongoing			STATE	
3. Complete modifications to deficient regulations - Subchapter 8, Ambient Standards				STATE	Since the Montana lead standard was adopted after an environmental impact statement, it has a sound basis and we d not plan to amend it However, we will review the SIP to determine if changes are needed to protec the NAAQS by the SIP process and MAAQS by a separate process.
4. Select lead control strategies; Demonstrate adequacy of lead SIP via modeling	11/92			STATE	
5. Develop draft lead SIP	12/92			STATE	
6. Conduct public hearing on lead SIP	1/93			STATE	
7. Submit lead SIP to EPA	2/93			STATE	
8. Lead SIP completeness determination	4/93			EPA	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
D. SO2					
East Helena		1.2[2]	79,228		
1. Submit protocol for SO_2 network modifications	Complete			STATE	
2. Submit protocol for meteorological network modifications (CTDM/PLUS)	Complete			STATE	
3. Provide comments on RTDM/ISC modeling	8/31/92			EPA	
4. Submit CTDM/PLUS modeling protocol	9/15/92			STATE	
5. Provide comments on protocol for SO_2 network modifications	9/15/92			EPA	
6. Provide comments on protocol for meteorological network modifications	9/15/92			EPA	
7. Submit QA/QC plan for modified SO_2 network	9/30/92			STATE	
8. Respond to EPA's comments on RTDM/ISC modeling	9/30/92			STATE	
9. Submit QA/QC plan for CEMS on SO_2 stacks	9/30/92			STATE	
10. Modify SO_2 network as per protocol	10/1/92			STATE	
11. Modify meteorological network as per protocol	10/1/92			STATE	
12. Evaluate GEP stack height issues and determine appropriate modeling parameters	10/15/92			EPA/STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
13. Provide comments on CTDM/PLUS modeling protocol	10/15/92			EPA	
14. Provide comments on QA/QC plan for modified EPA SO_2 network	10/15/92			EPA	
15. Submit RTDM/ISC results	10/15/92			STATE	
16. Install new CEMS on SO_2 stacks	10/15/92			STATE	
17. Certify CEMS and implement QA/QC plan	11/1/92			STATE	
18. Develop control strategies and SIP conditions (permit, order, etc.)	11/15/92			STATE	
19. Demonstrate attainment through RTDM/ISC modeling	11/30/92			STATE	
20. Provide public notice of SIP hearing	12/1/92			STATE	
21. Hold public hearing	1/15/93			STATE	
22. Correct or repeal SO_2 regulations for lead smelting facilities (ARM 16.8.1414); assure federal enforceability of new emission limits	1/15/93			STATE	
23. Submit SIP to EPA with extension request for secondary standard	2/15/93			STATE	
24. Completeness determination	4/15/93			EPA	
25. Submit an analysis of the relationship between the CEM data and the allowable emission limitations in the SIP	6/15/93			STATE	
26. Continue to develop SIP for secondary standard	Ongoing			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
Billings		No resources allocated			The personnel time associated with this task will be contingent on the amount o assistance provided by the industrial sources.
25. Call the Billings SO_2 SIP inadequate				EPA	The department will not proceed on the Billings SO_2 SIP until we have received assurance that a SIP call is coming. All dates will have to be negotiated at that time.
26. Review available air quality and nonattainment SIP information including, but not limited to, materials provided by the Regional Office	As appropriate			STATE	
27. Develop SO_2 SIP for Billings (including provisions for contingency measures, test methods, and nonattainment NSR) - contingent upon SIP call. All dates are subject to EPA SIP call.				STATE	
a. Develop a general SIP development protocol.				STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
b. Develop detailed protocols for the emission inventory and the dispersion modeling studies (the protocols should build upon the AIRS/AFS data system and the dispersion modeling already conducted to date by the DHES and the City of Billings.)				STATE	
c. Comment on protocols.				EPA	
d. Make any necessary changes to the Billings air monitoring network and continue to monitor SO_2.				STATE	
e. Continue meteorological monitoring				STATE	
f. Conduct the field portion of the emission inventory (build upon the existing emission inventory through source surveys, inspections, and source testing).				STATE	
g. Complete SO_2 emission inventory.				STATE	
h. Perform the dispersion modeling analysis (build upon the existing modeling studies).				STATE	
i. Based upon the dispersion modeling, select control strategies which will achieve and maintain the NAAQS.				STATE	
j. Incorporate the control strategies into the industrial source permits or into general regulations.				STATE	
k. Develop draft SIP.				STATE	
l. Conduct public hearings.				STATE	
m. Submit SO_2 SIP to EPA.				STATE	
n. SO_2 SIP completeness determination.				EPA	
E. Operate a Smoke Management Program with an Emphasis on PM-10 SIP-Related Enhancements	Ongoing	0.4	0		

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
1. Continue to manage major forestry slash burning impacts.				STATE	
2. Implement additional restrictions for burning in or near PM-10 nonattainment areas.				STATE	
3. Submit the annual Smoke Management Report.	2/93			STATE	
F. NOx		0.2	13,205		
1. Prepare a report on increment consumption by June 30 of each year. The report shall include:	6/93			STATE	As resources are available, this will be completed.
a. A listing of each increment consuming source and the permitted emission limits for the appropriate pollutant.					
b. A listing of any areas where stationary or area source growth is suspected of causing an increment violation.					
c. An increment consumption analysis for each area identified in the prior year's report as suspected of violating the increment.					
MONITORING		5.0	330,116		
1. Submit updated five year ambient air monitoring equipment plan. Submit report on FY92 equipment purchases.	9/1/92			STATE	
2. Review Quality Assurance Plan and SOPs and submit report.	7/30/93			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
3. Submit updated Network Review. Include comprehensive PM10 network design review.	9/1/92			STATE	
4. Operate air quality Network consistent with Network Review and QA Plan.	Ongoing				
5. Submit quarterly air quality monitoring data (SLAMS, SPM & Ind.) AIRS-AQS within 90 days after end of quarter.	Quarterly			STATE	
5a. (*)Submit AIRS-AQS Completeness Report and a data anomaly report within 120 days. Assure 75% completeness of each parameter per site per quarter.	Quarterly			STATE	
6. Submit AIRS-AQS SLAMS report (electronically).	7/1/93			STATE	
7. Apply for advanced EPA approval of any proposed monitoring network modification.	As Needed			STATE	
8. Attend EPA monitoring workshop if scheduled.	Annually			STATE	
9. Submit quarterly precision and accuracy data to AIRS-AQS within 90 days after the end of each quarter.	Quarterly			STATE	
10. Notify EPA in writing of any NAAQS exceedances within 45 days of exceedance excluding non-attainment areas.	Ongoing			STATE	
11. Conduct and report on performance and system audits on private industry, state and county monitoring programs.	Ongoing			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
12. Participate in National Performance Audit Program (PM10, Pb, CO, SO_2) Audit 25% of State operated monitors. (Subject to NPAP limitations.)	Ongoing			STATE	
13. Prepare and submit PM-10 saturation monitoring plan to be conducted in FY93.	60 days in advance			STATE	
13a. Submit monitoring plan for Missoula CO saturation study.	9/15/92			STATE/LOCAL	
13b. Conduct CO saturation study in Missoula.	12/92			STATE/LOCAL	
13c. Conduct PM-10 saturation study in Whitefish.	2/93			STATE/LOCAL	
13d. Submit final project reports for special studies within 90 days.				STATE/LOCAL	
14. (*)Enter site information into the AIRS-AQS site files for all active sites. Enter shutdown dates for all inactive monitors/sites.	Ongoing			STATE	
15. Send participants to annual AIRS conference with representatives for air quality, emission inventory and area/ mobile sources.	12/2-6/92			STATE	
16. Conduct CMB source apportionment study in Whitefish.				STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE'	EPA $	AGENCY	COMMENTS
17. Provide support for SO2 monitoring in Billings. Participate in BLAQTC and City of Billings dispersion modeling study (technical advisory committee).				STATE	
18. Review current PC, computer and communication system and identify deficiencies and upgrades needed to permit better utilization and access to AIRS, AIRS-Graphics and EPA bulletin boards.	11/1/92			STATE	AIRS-Graphics is still under development. MDHES is adding a number of modems.
19. Continue involvement in air monitoring coordinated by industry, Forest Service/ Park Service and Superfund contractors.				STATE	
VISIBILITY					No resources allocated.
1. Conduct periodic evaluations of Visibility SIP					
AIR TOXICS					
1. Prior to interim or final approval of the operating permit program, review & comment on applications for the Early Reduction Program under Title III Sec. 112(i)(5) and subsequent rule makings. After interim or final approval of the operating permit program, process fully applications for the program.					No resources allocated.
2. If permit program approved, implement modification provisions in Title III Section 112(g), pursuant to guidance.					Not in FY93.

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
3. Submit midyear and end-of-year Transition Plans.	12/30/93 6/30/93				
4. Assess authority to implement all provisions of Title III and develop regulations, as required.	6/93				
5. Begin adopting MACT standards as they are promulgated by EPA.	Ongoing				
6. Update NATICH database, as needed.	4/93				
PERMITTING					
A. New Source Review		2.5	0		
1. Operate a New Source Review Permit Program in accordance with Prevention of Significant Deterioration (PSD) and nonattainment area permitting requirements.	Ongoing			STATE	
2. Submit a copy to EPA of the public notice, the technical review and analysis, and the proposed permit or permit conditions at the start of the public comment period for the following sources:	Ongoing			STATE	
a. PSD permits for new and modified sources;					
b. Permits for Class A1 new sources;					
c. Permits for Class A1 modified sources (if permitting involves contemporaneous emission decreases);					

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
d. Permits for sources avoiding PSD requirements or major nonattainment requirements, by permit restrictions to reduce their potential emissions (synthetic minor); e. Permits for major new and major modified sources in nonattainment areas. The technical review and analysis must include an emission inventory, emission calculations, and a description of the source. A BACT analysis and modeling analysis must be included for the PSD permits.					
3. Copies of the final permits for the above sources will be submitted to EPA when issued. All EPA comments received during the public comment period shall be incorporated into the final permit or a written response to EPA will be prepared stating why the recommendations were rejected.	Ongoing			STATE	
4. Submit to the Federal Land manager a copy of all PSD permit applications and supplemental information, when received, for sources located within 100 kilometers of a Class I area.	Ongoing			STATE	
5. Submit RACT, BACT and LAER determinations to the EPA Clearinghouse pursuant to CAA amendments of 1990, Section 108(h).	Ongoing			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
6. Ensure that air quality modeling analyses prepared for major source permit applications consider minor source emissions since the minor source baseline date.	Ongoing			STATE	
7. EPA will provide to AQB a contact person for permitting questions and a mechanism to ensure timely and adequate review of AQB permits.				EPA	
B. Regulations Updates		0.70	0		
1. Adopt and submit to EPA revised NSR/PSD regulations for SIP approval. (Date must be tied to Governor's commitment letter for approval of PM-10 SIP.) Revise all NSR and PSD regulations to add new EPA promulgations, including those promulgated pursuant to the 1990 CAAA. Submit revisions according to schedule specified in promulgations.	6/93			STATE	
2. Develop and complete regulation revisions to address new and modified NESHAPS and NSPS regulations which have been promulgated through July 1, 1992.	9/92			STATE	
C. Operating Permit Program		2.0	0		
1. Update and submit, if needed, a schedule with milestones for development of operating permit program.	3/31/93			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
2. Continue development of operating permit program, including analysis of program costs.	Ongoing			STATE	
3. Complete activities to get the necessary enabling authority to implement program.	4/30/93			STATE	
4. Submit draft regulations for review and comment, as early as is feasible, to alleviate potential problems in the final state regulations.	Ongoing			STATE	
5. Continue efforts to obtain the necessary staff to administer the operating permits program and provide the necessary training.	Ongoing			STATE	
6. Attend applicable EPA workshops on Operating Permit program development.	Ongoing			STATE	
7. Submit SIP revision for implementing the Small Business Technical and Environmental Compliance Assistance Program Plan (SBAP).	11/15/92			STATE	
8. Submit quarterly progress report on Operating Permit Program including Small Business Programs.	Quarterly			STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
D. SIP-Driven Permit Activities Complete permit modifications for point sources in nonattainment areas subsequent to control strategy development. This will entail complete technical review and analysis of facilities including detailed emission inventories, emission calculations, RACT analysis, and coordination with the SIP.	Ongoing	0.5	0	STATE	
E. State-Mandated Permit Activities State-mandated permitting (non-PSD/NSR, attainment area), open burning permitting and Montana Environmental Policy Act review.	Ongoing	1.0	0	STATE	
ENFORCEMENT AND COMPLIANCE					
A. Enforcement		1.8	66,023		
1. Identify to EPA all violators subject to FY93 State/EPA Enforcement Agreement which are formally identified as significant violators.				STATE	
2. Initiate appropriate enforcement actions in a timely manner in accordance with State/EPA Enforcement Agreement.				STATE	
3. Seek appropriate penalties in accordance with State/EPA Enforcement Agreement taking into consideration limitations imposed by state Clean Air Act.				STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
4. Submit copies of all enforcement actions (NOVs, Administrative Orders, consent decrees, Attorney General referrals, Board orders) to EPA for all sources subject to CMS, NSPS and NESHAP. Enter enforcement data into AFS.				STATE	
5. Review source self-monitoring compliance reports and emission reports (EERs) from CEM sources and take appropriate enforcement action for non-compliers, in accordance with the SEA EA. Review the QA information in source self-monitoring reports (which include EERs) and FSA (fuel sampling & analysis) reports, at least in non-compliance situations.				STATE	
6. Consult with EPA monthly on the compliance status of SV enforcement actions.				STATE	
B. Compliance Monitoring Strategy/ Inspections/Reporting		2.7	0		
1. Submit to EPA a Compliance Monitoring Strategy (CMS) for FY93 pursuant to EPA national guidance on CMS.	10/31/92			STATE	
2. Negotiate with EPA a ranking method in the CMS plan which includes a list of sources to be inspected which is mutually acceptable to the State and EPA.				STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
3. As a minimum, conduct Level II inspections at all sources targeted for inspection under the State's FY93 CMS plan, at the frequency indicated in the plan. Verify accuracy of emission data collected in relation to the targeted sources, concentrating on sources in nonattainment areas.	Ongoing			STATE	
3a. Submit CMS plan for FY94.	8/31/93			STATE	
4. Participate in a multimedia inspection program to the degree necessary and as dictated by the CMS plan and available personnel.	9/30/93			STATE/EPA	
5. Submit compliance/inspection reports to EPA within 60 days of inspection completion.				STATE	
6. Compliance Tracking and Reporting					
a. Provide data to AFS which allows identification of all sources subject to CMS, including: 1) CMS Group I: All Class A SIP sources (including all sources in nonattainment areas which are Class A for the nonattainment pollutant), all Class A and B NSPS sources, and all non-transitory NESHAP sources.					

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
2) CMS Group II: Exclusive of Group I sources, all other stationary sources identified in the State's CMS plan for FY93 inspection.					
b. Provide timely data to AFS on sources subject to CMS, including:					
1) General description of each source (name, location, process description, SIC code, applicable air programs and regulations, emission points)					
2) Compliance and operating status					
3) Compliance activities (inspections, performance tests, enforcement actions, updates of emission inventory pursuant to annual on-site inspections)					
4) Types of criteria pollutants emitted, including attainment/ nonattainment area status of each pollutant, and size classification for each pollutant					
c. Track compliance of sources on compliance schedules and report on status through AFS.					
7. Conduct EPA Method 9 visible emissions certification program, including "smoke schools" and at least one annual classroom session on Method 9.				STATE	
8. Maintain a qualified inspector force by allowing state inspectors to atend EPA-sponsored training courses.				STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
9. Oversight inspections will be conducted by EPA on 5-10% of sources listed on the state's inspection list.				EPA	
C. Annual Point Source Emission Inventory		0.6	0		
1. The state shall identify all stationary points and sources of air pollution operating in the state.				STATE	
2. Pollutant parameters such as pollutant type, quantity, volumes, velocity, temperature, etc., from each point will be compiled.				STATE	
3. Operating parameters such as hours of operation, capacity of equipment, equipment usage, products produced, raw materials utilized, etc., will also be collected.				STATE	
4. All relevant and pertinent emission inventory data will be entered into the AIRS/AFS system.	7/1/93				STATE
D. Continuous Emission Monitoring (CEM)/ Stack Testing		0.2	0		
1. Develop a statewide CEM quality assurance (QA) program with a proposed schedule for implementation.	3/31/93				

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
2. Observe and review performance specification tets for CEMs, including test protocols and any concurrent stack tests as resources allow.					
3. Review data assessment reports that are required by 40 CFR 60, Appendix F.					
4. Maintain qualified CEM enforcement staff by providing for attendance at EPA-sponsored CEM training courses and workshops.	Ongoing			STATE	Subject to available travel budget.
5. Review stack test protocols.				STATE	
6. Observe on-site stack tests.				STATE	As resources available.
7. Review stack test reports for completeness, accuracy and compliance.				STATE	As resources available.
PROGRAM ADMINISTRATION		7.0	462,163		
A. Personnel Management				STATE	
B. Program Administration				STATE	
C. Legislative Liaison				STATE	
D. EPA Liaison				STATE	
E. County Program Oversight				STATE	
F. Training				STATE	

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
G. Legal Support				STATE	
H. Computer Support				STATE	
I. Clerical Support				STATE	
J. Public Relations				STATE	
Asbestos:		0.4	26,409		
A. Asbestos inspections:	9/30/93			STATE	The DHES Occupational Health Bureau performs NESHAP asbestos activities. If threatened personnel reductions occur, this program will be eliminated.
The inspection commitments below shall apply unless the state submits an alternative inspection strategy to EPA which is mutually acceptable to the state and EPA.					
1. Inspect each major asbestos contractor annually.					
2. Inspect 50% of the minor asbestos contractors annually. (The definition of "minor contractor", as established by agreement of EPA and the Region VIII States, is defined as a contractor with less than 3 notifications during the fiscal year.)					
3. Thirty percent of all inspections must be conducted outside the capital city, if a sufficient number of notifications are received for removal jobs outside the capital city.					
4. Inspect five asbestos approved landfills.					

ACTIVITY/OUTPUT	DUE DATE	STATE FTE[1]	EPA $	AGENCY	COMMENTS
B. Report information to the National Asbestos Registry System through ACTS. Perform appropriate QA/QC on all ACTS data submitted.	Within 30 days of the end of the quarter			STATE	
C. Submit to EPA copies of all inspection reports, checklists, (including those from delegated counties), waste shipment discrepancies and exception reports, and identify violators.	Within 30 days of the end of the inspection month.			STATE	
D. Take appropriate enforcement actions for all asbestos violators, in accordance with the SEA EA. Submit copies of enforcement actions to EPA upon issuance. Update EPA on enforcement status of violators monthly. Implement asbestos T&A guidelines, as available.	Ongoing			STATE	
E. Implement the revised Asbestos NESHAP Strategy emphasizing enforcement and cross-program components.	Ongoing			STATE	
F. Provide inspection training, safety training, and medical monitoring for asbestos inspectors.	Ongoing			STATE	
G. Attend EPA/State Asbestos Workgroup meeting.	Annually			STATE	
TOTAL = 30.5 FTE*			$1,261,045		

[1] Only State FTEs.
[2] Assume major financial assistance from industries.

*Due to vacancies, hiring delays and threatened personnel reductions, estimate 28.0 FTE available in FY93.